POLICY ON THE PREVENTION OF HARASSMENT AND

VIOLENCE IN THE WORKPLACE



HUMAN RESOURCES - OCCUPATIONAL HEALTH AND SAFETY

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1. Background

Bill C-65, an Act to amend the Canada Labour Code (harassment and violence) modified the framework under Part II of the <u>Canada Labour Code</u>, (the <u>Code</u>), for the prevention of harassment and violence, including sexual harassment and sexual violence, in workplaces under federal jurisdiction.

The framework established by Bill C-65 has three main pillars:

- preventing incidents of harassment and violence from occurring;
- · responding effectively to these incidents when they do occur; and
- supporting victims, survivors and employers in the process.

In accordance with the *Code*, Part II - Occupational Health and Safety, federally regulated employers, including the public service, must protect the health and safety of their employees. In the federal public service, this falls under the responsibility of each deputy head as employers.

The <u>Work Place Harassment and Violence Prevention Regulations</u> (the Regulations) under the Code, stipulate that an employer and the applicable partner must jointly develop a workplace harassment and violence prevention policy and that policy must contain elements outlined in Section 10(1)(2) of the Regulations.

In accordance with the Work Place Harassment and Violence Prevention Regulations and the <u>Treasury Board Directive on the Prevention and Resolution of Workplace Harassment and Violence</u>, this policy has been jointly developed with Labour Relations, Occupational Health and Safety, Well-being and the Policy Occupational Health and Safety (OHS) Committee.

This policy should be read in conjunction with the Treasury Board Policy on People Management, the Treasury Board Directive on the Prevention and Resolution of Workplace Harassment and Violence. the Work Place Harassment and Violence Prevention Regulations under the *Code*, the *Canadian Human Rights*<u>Act</u> (CHRA) and the National Joint Council (NJC) OHS Directive, where appropriate

2. Effective Date

This Policy on the Prevention of Harassment and Violence in the Workplace takes effect on January 1, 2021.

To ensure this policy remains current and up to date, it should be reviewed in consultation with the National Policy OHS Committee at least once every three (3) years. The policy will also be updated, if necessary, following an update to a workplace assessment or if there is a change to any element of the policy or the Regulations or if an additional hazard has been identified under the Canada Occupational Health and Safety Regulations (COHSR), (Hazard Prevention Program 19.3). The date of the last review is indicated in the policy.

3. Mission Statement

The Impact Assessment Agency of Canada (IAAC) recognizes the potential for harassment and violence in the workplace and is committed to providing a safe, healthy, violence-free and supportive work environment to all persons employed by the Agency. The Agency will not tolerate any person subjecting any employee or other person to harassing behaviour and/or violence in the workplace and will take action to protect its employees. This includes any behaviour along the continuum of inappropriate behaviours that contribute to an unhealthy work place, including, but are not limited to:

- Malicious teasing
- Bullying
- Abusive or disrespectful conduct such as aggressiveness, isolation, gossip, and humiliation
- Abuse of authority
- Assault (verbal or physical)
- Unwanted personal/romantic advances
- Sexual harassment and sexual violence
- Improper conduct linked to grounds of discrimination as set out in the Canadian Human Rights Act

Occurrences of inappropriate behaviour covered under this policy are not limited to in-person interactions, but also apply in other ways such as virtual interactions and written communication.

3.1 Context

In a complex and demanding work environment where diverse people are expected to collaborate, misunderstandings and interpersonal conflicts will happen.

The Agency Code of Values and Ethics is a guide for all persons employed by the Agency on the behaviours expected in the workplace. The Code helps shape the Agency's culture which influences how colleagues at all levels interact with one another; essentially, the Code and culture promote the awareness and practice of good communication and effective interpersonal skills. It is everyone's personal responsibility to make ongoing efforts to demonstrate respect. Early and informal approaches to resolve conflicts help prevent or reduce inappropriate behaviours such as harassment and violence, and should be pursued even once a formal complaint process has begun.

Harassment and violence, including sexual harassment and sexual violence, continue to occur in federally regulated work places. Many persons employed who experienced harassment and violence in the work place do not report it; they may fear retribution or a lack of support or they may believe that what they experienced does not substantiate a complaint. Harassment and violence in the workplace can have devastating effects on the quality of life for people who experience it as well as on organizational productivity.

3.2 Scope

The scope of this policy applies to all persons employed by the Agency and all persons granted access to workplaces controlled by the Agency. It also applies at any location or any event considered an extension of the workplace, including while:

- Teleworking;
- On travel status;
- At a conference where the attendance is sponsored by the employer;
- At employer sponsored training activities/information sessions;
- At employer sponsored events, including social events.

This may include off-site locations which may or may not be controlled by the Agency where employees are involved in performing Agency duties.

If the conflict occurs between persons employed by two different federal organizations, the Agency will work in conjunction with the other entity to address the situation.

4. Roles and Responsibilities

4.1 The Agency / Employer

The deputy head for the Agency is the President. In this section, the term "Agency" is used, but understanding that ultimately, the delegated authority and accountability remain with the President.

The Agency is responsible and accountable for the establishing and maintaining a respectful, harassment and violence free workplace and for the prompt resolution of related complaints. The Agency holds the responsibility to protect employees from harassment beyond the requirement of the <u>Canadian Human Rights</u> <u>Act</u>, which forbids harassment on prohibited grounds of discrimination. The Agency—in accordance with the <u>Canada Labour Code, Part II</u>, the <u>Canada Occupational Health and Safety Regulations</u> and the <u>Work Place Harassment and Violence Prevention Regulations</u> — is to act on all forms of harassment and violence by providing employees with a safe, healthy, and violence-free work environment and dedicating sufficient attention, resources and time to address factors that contribute to workplace violence including bullying, teasing and other aggressive or abusive behaviours.

The Agency is responsible for

- Dedicating sufficient attention, resources and time to address factors that contribute to workplace violence and to prevent and protect against it;
- Ensuring that measures and procedures are identified in the Agency's harassment and violence
 prevention policy instruments and program, including protecting a harassment and violence
 investigator's impartiality in accordance with principles of natural justice and procedural fairness;
- Ensuring that all identified measures are available and applied;
- Ensuring that management is held accountable for responding to and resolving complaints of harassment and violence; and

 Ensuring that appropriate infrastructure is place and that actions are taken to review, address and resolve any incident of work place harassment and violence.

4.2 Supervisors at All Levels

A supervisor is an employee who has the responsibility for day-to-day supervision of other employees, (ex: assign work, set priorities, assess performance, and approve or recommend approval of leave).

Supervisors are responsible for supporting the Agency in the obligations related to the <u>Canadian Human Rights Act</u>, the <u>Canada Labour Code</u>, <u>Part II</u>, the <u>Canada Occupational Health and Safety Regulations</u> and the <u>Work Place Harassment and Violence Prevention Regulations</u> and must dedicate sufficient attention, resources and time to address factors that contribute to workplace violence including, but not limited to, bullying, teasing, and abusive and other aggressive behaviour and to prevent and protect against it." Early and informal approaches to resolving conflicts help to prevent or reduce occurrences of bullying, harassment, discrimination and violence, and should be pursued even once a formal complaint process has been engaged</u>. Supervisors are encouraged to seek guidance from the Occupational Health and Safety team in this regard.

Supervisors at all levels are responsible for

- Fostering respect in the workplace by being visible role models and demonstrating the behaviours expected in the workplace (setting the "tone at the top"). This includes:
 - Ensuring open communication;
 - Distributing work fairly;
 - Managing conflicts early and appropriately; and
 - o Knowing how to recognize and to respond to the signs of harassment and violence.
- Taking appropriate and immediate action when made aware of disrespectful behaviour.
- Contacting the Occupational Health and Safety team regarding concerns brought forward by an employee or to address an incident of workplace violence;
- Ensuring, in consultation with the Workplace OHS Committee / Health and Safety Representative, the accomodations and security manager, that an assessment of workplace with risk factors for workplace violence is carried out, and implementing controls as soon as practical, but no later than 90 days after the day on which the risk of workplace violence has been assessed, and providing a copy to the Corporate OHS Team;
- Ensuring their employees attend appropriate training on the prevention of workplace harassment and violence at least every 3 years; and
- Ensuring that persons granted access to workplaces controlled by the Agency are informed that the
 Agency will not tolerate any persons subjecting any employee or other person to workplace
 harassment or violence or intentionally behaving in a manner known to contribute to workplace
 violence. This includes ensuring that personas managing procurement contracts include relevant
 language with the contact.

Supervisors must take action when they observe or are informed of any type of inappropriate or disrespectful behaviour occurring within their work unit. Failure to uphold this policy may lead to disciplinary and/or administrative measures as it is a failure to uphold the <u>Values and Ethics Code for the Public Sector</u> and the <u>Agency Code of Values and Ethics</u>, and a failure of managerial responsibility.

When there is an occurrence of harassment or violence, supervisors are responsible for

- a) Calling the 911 emergency services and/or contacting the on-duty guard or Corporate Security when a situation is deemed life-threatening or a threat to individual safety;
- Ensuring that the local police service is informed of any cases of harassment of a criminal nature (ex: assault, physical violence) and keeping a record of the date, time, and person/resource contacted;
- Ensuring that the principal party and witnesses of workplace violence are made aware of—and have access to—support services such as
 - immediate medical attention, if required;
 - Employee Assistance Program (EAP) counselling;
 - use of the Workplace Conflict Management if required;
 - · group debriefing sessions as deemed necessary; and
 - bargaining agent participation and support.
- d) Ensuring that the Designated recipient is informed of all incidents of workplace harassment or violence and keeping a record of the date, time, and person contacted;
- e) Ensuring that the lowest level of management not implicated in the complaint will participate in the Employer's response; and
- f) Completing all forms and documentation requested by the OHS team and participating in any workplace assessments, investigations, or reviews conducted by the OHS team.

4.3 Bargaining Agents

Bargaining agents are partners in ensuring safe and healthy work places. They are a primary source of support and advice for any employee experiencing or observing behaviour that poses an immediate threat and may lead to workplace violence, whether within or outside the workplace in the course of their duties.

Bargaining Agents are responsible for

- Working with and collaborating in the development and implementation of this Policy;
- Providing assistance to employees in reporting inappropriate behaviours immediately to
 - o the appropriate authorities (for example, Police, Security, Fire, etc.) and
 - to the Designated Recipient.
- Supporting employees as they cooperate with any person carrying out a duty or function required by this Policy.

4.4 Designated Recipient

At the Agency, the Designated Recipient is the corporate Occupational Health and Safety (OHS) team. They are a neutral entity that guides and assists principal parties, responding parties, and the management teams throughout the complaint resolution process. The Corporate OHS team also works with partners such as Labour Relations Unit, Well-being and Corporate Security to create occurrence-specific response teams to coordinate efforts to restore the workplace.

The Corporate OHS Team can be reached by email at: iaac.OHS-SST.aeic@canada.ca.

The Designated Recipient is responsible for

- Acting as the reception point for all harassment and violence complaints;
- Reviewing, coordinating, and responding to all reports of harassment, violence or threats of violence
 in a prompt, objective and sensitive manner, and within the prescribed timelines (refer to the
 resolution process for additional information and to Appendix A of this Policy);
- Encouraging and facilitating early and informal approaches to resolving conflicts even once a formal complaint process has been engaged;
- Regarding investigations:
 - Investigating—or coordinating the investigation of—complaints or incidents of workplace harassment or violence in a fair, respectful and timely manner. Information provided occurrence will not be disclosed except as necessary to
 - protect workers;
 - investigate the complaint or incident;
 - take corrective action, and
 - as otherwise required by law.
 - Ensuring investigator impartiality, independence and compliance with the principles of natural justice and procedural fairness;
- Developing, delivering and/or coordinating the delivery of harassment and violence training;
- Raising awareness of the policy and resources available to help prevent and address harassment and violence in the workplace;
- Monitoring, reviewing and making recommendations to the applicable partner in relation to the policy;
- Ensure the health and safety of the workplace while the alleged of harassment or violence is reviewed through the Agency's harassment and violence prevention process;
- Tracking data in relation to harassment and violence for analysis and reporting purposes; and
- Respecting the principles of procedural fairness towards the principal party, the responding party and all other parties involved.

4.5 Competent Person / Investigator

If efforts at early resolution or conciliation fail, and the principal party decides they wish to pursue the investigation route, the Designated Recipient must appoint a competent person to investigate the workplace harassment / violence incident. The investigator can be an Agency employee or an outside person or entity, but must:

- Be selected from the Agency's list of competent investigators approved by the Agency's National Policy OHS Committee. A competent investigator must:
 - be trained in investigative techniques;
 - have knowledge, training and experience that are relevant to harassment and violence in the workplace;
 - have knowledge of the Act, the <u>Canadian Human Rights Act</u> and any other legislation that is relevant to harassment and violence in the workplace; and
 - o provide the designated recipient, principal party and responding party with a written statement indicating that the person is not in a conflict of interest in respect of the occurrence.

- Act as an independent third party and maintain impartiality while conducting the investigation, and
 preparing any reports, documents, recommendations and findings in relation to the incident as per
 the impartiality requirements of the Canada Labour Code; and
- Respect the investigation mandate provided by the Designated Recipient and provide the unit with all documentation set out in the mandate for distribution to the relevant parties.

4.6 Employees at All Levels

It is every person's responsibility to make ongoing efforts to demonstrate respect and to address conflicts early. Early and informal approaches to resolving conflicts help to prevent or reduce occurrences of bullying, harassment, discrimination and violence, and should be pursued even once a formal complaint process has been engaged.

Persons who fail to take action when they witness any type of inappropriate or disrespectful behaviour occurring within their work unit are tacitly approving these behaviours by their inaction. Therefore, in the course of their duties, whether within or outside the workplace, when persons employed at IAAC experience or observe threats, incidents or injuries of harassment or violence, or behaviours that poses an immediate threat and may lead to workplace violence, they are responsible for immediately reporting the occurrence to

- their respective supervisor or skip-level supervisor and/or
- the appropriate authorities (for example, Police, Security, Fire, etc.), as appropriate.

In addition, all persons employed are responsible for

- Adhering at all times to the Agency's ethical standards and values, as well as the applicable codes
 of conduct. This includes conducting themselves in a non-threatening way;
- Participating in education and training programs;
- Understanding and complying with the violence and harassment prevention policies and related procedures;
- Seeking support when experiencing or witnessing violence/harassment or threats of violence. This
 includes
 - Signaling experienced or witnessed occurrences:
 - Informing the Corporate OHS team about concerns regarding the potential for violence/harassment in the workplace; and
 - Getting medical attention, if required. If medical attention is required as a result of workincident, reporting to the ESDC Labour Program within three days (Worker's Compensation Board).
- Completing the Workplace Violence Incident Report when appropriate (LAB1070);
- Contributing to risk assessments, if required; and;
- Cooperating with any person carrying out a duty or function required by this policy.

4.7 Employer Response

Following a reported incident of alleged harassment or violence, the Designated Recipient will establish relations with appropriate partners (labour relations, security and/or values and ethics, etc.). At this point, it is not to establish whether or not harassment / violence occurred, but rather to recommend to

management measures to protect the health and wellbeing of the named parties and of the workplace as a whole, and steps to prevent further incidents while the notice of occurrence is being addressed through the Agency's Harassment and Violence prevention process.

4.8 National Policy OHS Committee / Workplace OHS Committee / Corporate OHS Team

4.8.1 National Policy OHS Committee

- Jointly developing a workplace harassment and violence prevention policy and jointly reviewing and updating the policy with the employer;
- Jointly developing or identifying the training and jointly reviewing and updating it with the employer;
 and
- Jointly developing or identifying a list of investigators with the employer.

4.8.2 Workplace OHS Committee

 Jointly carrying out a work place assessment and jointly monitoring, reviewing and updating the assessment with the employer.

4.8.3 Corporate OHS Team

- Acting as the Designated Recipient;
- Providing advice and guidance on issues relating to violence prevention in the workplace;
- Reporting on the effectiveness of the workplace violence prevention measures;
- Participating in the development and the implementation of this policy, including training on violence prevention in the workplace;
- Ensuring the health and safety of the workplace while the alleged of harassment or violence is reviewed through the Agencys harassment prevention process; and
- Ensuring that applicable response protocols and operational procedures are followed.

4.9 Corporate Security

- Providing advice and guidance on measures and controls to be implemented;
- Providing police and emergency response liaison services when emergency services on-site;
- Ensuring that applicable response protocols, operational procedures and action plans are followed, and that security incidents are reported;
- Participating, as a member of the Employer Response team, to ensure the health and safety of the workplace while the alleged of harassment or violence is reviewed through the Agency's harassment prevention process, if needed; and

 Investigating, if need be, incidents of violence in the workplace as per their mandate, apart from the requirements of the Canada Labour Code, to determine if there was a security breach.

5. Risk Factors that can Contribute to Harassment and Violence in the Workplace

Some workplace factors, such as the culture and climate (for example everyday behaviours, how things are organized and managed, a lack of diversity in the workplace), the nature of the work (for example duties and tasks, the daily routine), work environment coupled with societal factors, (the geographical location, the physical layout of the work space), organizational stress and changes can lead to an increased risk of workplace harassment and violence. In addition, there are stressors and aspects of work that can also increase these risks.

However, most incidents of workplace harassment and violence do not have a single cause; it is rather the result of multiple ongoing and concurrent events both in and outside of the workplace. Furthermore, there is a great deal of variability: a stressor or a set of stressors can lead one person to carrying out an act of workplace violence while the same stressor(s) may have little or no effect on another person. Nevertheless, if left unaddressed, these factors and stressors may cause situations to escalate to workplace harassment and violence.

Certain tasks, processes, and interactions, can put employees at an increased risk:

- Working with the public
- · Handling money or valuables
- Carrying out inspection or enforcement duties
- Working alone or in small numbers
- Working in community-based settings
- Working in remote locations
- Having a mobile workplace

The risk may also be greater at certain times of the day, night, or year:

- Peak periods of work
- Late hours of the night or early hours of the morning
- Tax return season
- During the holidays
- Pay days
- Performance appraisals

Stressors that can increase the risk of workplace harassment and violence:

- Personal life events
- Work-life events

- Difficult inter-office relationships
- · Feeling of unfair treatment
- Negative work culture/climate/environment

6. Training

6.1 Training for All Employees at All Levels

All employees of the Agency will be required to complete training touching on organisational culture, civility and respect, the prevention of harassment and violence, the actions to take to support and manage an occurrence brought forward, what are the impacts of harassment and violence, and the complaint process.

The Agency will provide all its employees training on harassment and violence prevention. This course will cover:

- 1. elements of the workplace harassment and violence prevention policy;
- 2. a description of the relationship between workplace harassment and violence and the prohibited grounds of discrimination under the *Canadian human rights act*; and,
- 3. how to recognize, minimize and prevention workplace harassment and violence.

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

For existing employees on the day this Policy takes effect, a period of a year will be granted to complete the training course.

Refer to <u>Appendix B - Training Options</u> for a list of available training courses offered by the Canada School of Public Service (CSPS).

6.2 Supervisor-Specific Training

All supervisors at all levels, including acting supervisors, within the Agency will be required to complete specific leadership training with situational/case-based scenarios to become better equipped on how to respond appropriately to different situations/contexts. This training will be required within 90 days of occupying a supervisory position.

7. Resolution Process

7.1 Designated Point of Contact

The Designated Recipient of questions of complaints of harassment and violence is the OHS team. The OHS team can be reached by email at: iaac.OHS-SST.aeic@canada.ca.

7.2 Process

Please consult Appendix A for additional details on the process that must be followed.

Most templates to communicate the steps to parties can be found in GCDocs.

- 1. A notice of occurrence (previously known as a complaint) is submitted orally or in writing via the intake form to the designated recipient.
- 2. The notice of occurrence is received by the designated recipient, initial review performed and tagged in the notice of occurrences log.
 - 2.1. Initial evaluation:
 - 2.1.1. As per Section 16 of the Regulation, the notice of occurrence must contain
 - 2.1.1.1. the name of the principal party and the responding party, if known;
 - 2.1.1.2. the date of the occurrence; and
 - 2.1.1.3. a detailed description of the occurrence.
 - 2.1.2. As per Section 19 (2) of the Regulation, the occurrence is deemed to be resolved if the notice does not contain the name of the principal party or otherwise allow their identity to be determined.
 - 2.2. In maintaining the notice of occurrences log, the Designated Recipient should also flag the file for urgent evaluation if any indication of violence or threat of violence.
- Secured email is sent out from the designated recipient within 7 days to the principal party and the
 notifying witness (if witness is not anonymous) acknowledging the reception of the notice of occurrence
 and establishing a contact point for the specific incident.
 - 3.1. This should be a standardized template letter.
 - 3.2. The letter will include
 - 3.2.1. The name and role of the advisor assigned to the file; and
 - 3.2.2. The contact information of the assigned Advisor along with a confirmation that they will be in touch within the week.
- 4. Second evaluation: Done by the assigned Advisor from Designated Recipient.
 - 4.1. Discussion with the principal party whether or not the notice of occurrence provided describes an action, conduct or comment that constitutes harassment and violence as defined in subsection 122(1) of the Act (falls within the continuum of harassment and violence).
 - 4.1.1. If yes, proceed.
 - 4.1.2. If no, file closed and principal party advised/transferred to appropriate support.
 - 4.2. Regardless of 5.1, this evaluation may include **rapid activation** if:
 - 4.2.1. Physical Violence of any sort has occurred
 - 4.2.2. There is a threat of violence
 - 4.2.3. Any circumstance where the police are—or could be—called
 - 4.2.4. If the principal party is on, or about to depart on, sick leave because of the occurrence
- 5. As per Section 23 (2) of the regulations, if the Designated Recipient and the principal party decide that the notice of occurrence meets the definition of harassment and violence as defined in subsection 122(1) of the Canada Labour Code, notice is sent to the respondent of the notice of occurrence using a standardized template.

- 6. All parties implicated in the Notice of Occurrence will make every effort, in good faith, to bring about early resolution of the issue.
- 7. the Designated Recipient will ask the principal party whether or not they wish to continue with the process and to select between conciliation or an investigation.
 - 7.1. If the principal party selects Conciliation, with agreement by the responding party, each party must agree on a facilitator (the Designated Recipient will make recommendations).
 - 7.1.1. The notice of occurrence must be resolved within **one year**
 - 7.1.2. The principal or responding party may choose to withdraw from conciliation at any time. The principal party may also request an investigation at any time by notifying the designated recipient. The one-year timeline for resolution remains in place.
 - 7.1.3. Conciliation efforts may continue during the course of the investigation, but will cease once the investigator has provided their report.
 - 7.1.4. The Designated Recipient must provide monthly update regarding the status of the resolution process to the principal and responding parties.
 - 7.2. If the principal party selects Investigation, the designated recipient must notify the principal party and the responding party that an investigation is to be carried out and the timeframe to conclude the process will be highlighted.
 - 7.2.1. The notice of occurrence must be resolved within one year.
 - 7.2.2. The Designated Recipient will assign an investigator to review the notice of occurrence from the Agency's pre-approved list.
 - 7.2.2.1. The investigator must be from the Agency's list of qualified investigators, but cannot be the same person as the Advisor assigned as file liaison.
 - 7.2.2.2. Investigator is provided with all information that is relevant to the investigation, as well as the investigation mandate. If the alleged incident is one in which disciplinary action may be warranted, the Labout Relations Advisor may request the investigator, as part of their mandate, to produce both an impartial Health and Safety Report in accordance with the requirements of the Code, and a second impartial factual report containing sufficient contextual information to be used for disciplinary purposes.
 - 7.2.3. Investigation occurs.
 - 7.2.4. Designated Recipient provides monthly update regarding the status of the resolution process to the principal party and respondent.
 - 7.2.5. The Investigator submits a factual Health and Safety summary report which will protect the identities of all parties and will include:
 - 7.2.5.1. The investigator's mandate/role and powers;
 - 7.2.5.2. Context (includes general information about the allegations);
 - 7.2.5.3. A general description of the occurrence;
 - 7.2.5.4. Conclusions in two parts, first on the occurrence itself and second on the circumstances that contributed to the occurrence; and
 - 7.2.5.5. Recommendations to mitigate the risk of a similar occurrence.
 - 7.2.5.6. If the investigation data may be used for disciplinary purposes a separate factual report would be prepared including a detailed description of, and information related to, the occurrence. This report would only be shared and used in accordance with the disciplinary process within the Agency. Labour Relations can be consulted as needed.
- 8. Designated Recipient will share the report(s) with ATIP for screening.

- 9. Summary Health and Safety Report shared with the:
 - 9.1. Principal Party;
 - 9.2. Responding Party; and the
 - 9.3. Workplace OHS Committee or Health and Safety Representative;
 - 9.3.1. If to be used for disciplinary purposes, the separate factual report, including names of parties and witnesses, will be shared with Labour Relations as per the disciplinary investigation process on a need to know basis, in keeping with the requirement of procedural fairness.
- 10. Once the report and recommendations are received, the Employer and applicable partner (Workplace OHS Committee, Health and Safety Representative, or National Policy OHS Committee depending on the scope of the recommendations) will:
 - 10.1. review and discusse the recommendations.
 - 10.2. jointly determine which recommendations are to be implemented.
 - 10.3. As part of this process, the designated recipient will assist with the implementation of recommendations, including, but not limited to, assisting with training delivery, liaising with various Agency parties to establish accommodations, enabling coaching or assistance, and developing working tools such as team charters to restore a healthy workspace.
 - 10.4. For the purposes of reports and recommendations focused on a specific workplace (ie: not recommending changes to the Agency wide instruments such as the Agency policy, training, etc.) the Employer will be considered the lowest level manager exerting control over the workplace the report and recommendations address.
- 11. Review/Assess success
 - 11.1. Has the issue been resolved?
 - 11.2. Assess whether the occurrence warrants changes to any of the core documents:
 - 11.2.1. Modifications required to existing training?
 - 11.2.2. Modifications required to existing workplace assessments?
 - 11.2.3. Modifications required to existing Agency's Policy?
 - 11.3. Is there additional work required regarding workplace restauration?
- 12. Log in reporting system / Excel spreadsheet.
- 13. Report annually to the Minister of Labour.

7.3 Malicious Use of this Policy

7.3.1 Acts of Retaliation

The Agency strictly prohibits acts of retaliation towards any individual(s) who comes forward with allegations of inappropriate or disrespectful behaviour (regardless whether allegations are founded or not) or who participates in investigations. The Agency will make every reasonable effort to protect such individuals.

Individual(s) who engage in acts of retaliation may be subject to administrative or disciplinary measures as appropriate, up to and including possible termination of employment after a consultation with Labour Relations.

7.3.2 False Allegations of Harassment or Violence (trivial, vexatious or bad faith complaints)

The Agency strongly encourages employees to come forward with suspicions or concerns of inappropriate or disrespectful behaviour. Accusations of inappropriate and disrespectful behaviour such as harassment or bullying is a serious matter and must not be made lightly.

Individuals who are uncertain whether an action or situation constitutes inappropriate or disrespectful behaviour may seek guidance from the Labour Relations Team, their supervisor or skip-level supervisor, or a bargaining agent. Individuals who are found to have put forth a trivial, frivolous or vexatious complaint or a complaint made in bad faith (for example made in retaliation or motivated by ill will or malice) may be subject to administrative or disciplinary measures as appropriate, up to and including possible termination of employment after a consultation with Labour Relations.

8. Workplace Assessment Review

As per the Work Place Harassment and Violence Prevention Regulations, the employer and the applicable partner must jointly carry out work place assessments that consists of the identification of risk factors and develop and implement preventive measures.

The employer and the applicable partner must jointly identify the risk factors, internal and external to the work place, that contribute to harassment and violence in the work place, including:

- the culture, conditions, activities and organizational structure of the work place;
- the circumstances external to the work place, such as family violence, that could give rise to harassment and violence in the work place;
- any reports, records and data that are related to harassment and violence in the work place;
- the physical design of the work place; and
- the measures that are in place to protect psychological health and safety in the work place.

Within six months following the identification of the risk factors, the employer and the applicable partner must jointly

- develop preventive measures and a corresponding implementation plan to mitigate the risk of harassment and violence in the work place, and
- implement the preventive measures.

The employer and the applicable partner must jointly

- monitor the accuracy of the work place assessment and, if necessary, update it to reflect a change to the information set out in the assessment, namely:
 - any change to the risk factors;
 - any change that compromises the effectiveness of a preventive measure developed and implemented; and
- jointly review the work place assessment every three years and update it as necessary.

In addition, the employer and the OHS Workplace Committee or the Health and Safety Representative must jointly review and, if necessary, update the workplace assessment if notice of an occurrence is provided in writing or orally, and if the following conditions apply:

- the occurrence is not resolved and the principal party ends the resolution process; or
- the responding party is not an employee or the employer.

9. Domestic Violence

Violence, no matter where it takes place, can impact all areas of someone's life – including their workplace.

Domestic violence can also fit to the following terminology:

- family violence
- gender-based violence
- · intimate partner violence, or
- violence against women

No matter how it is label, domestic violence can happen to people of all genders. It happens in all racial, economic and religious backgrounds. It exists in relationships regardless of sexual orientation.

Domestic violence can include:

- stalking
- verbal abuse
- use of property, children, or pets to threaten and intimidate
- physical violence, sexual, emotional, and psychological intimidation
- use of electronic devices to harass and control (technology-facilitated abuse), or economic abuse like
 - withholding or stealing money, or
 - stopping a partner from reporting to work.

Domestic violence may extend into the workplace where the aggressor uses emails, phone calls, text messages, stalking or showing up to the workplace to question co-workers. This can affect employment productivity and health and safety; organizations can help to recognize, respond to and address the impacts of domestic violence.

The Agency has a responsibility under the *Canada Labour Code* to protect and prevent against all forms of harassment and violence, including domestic violence.

Upon being made aware that an employee is or is likely to be exposed to domestic violence or third party harassment or violence in the workplace, the Agency will take appropriate precautions to protect the employee and any other persons at the workplace likely to be affected.

Employees are encouraged to seek support and report domestic violence so that appropriate safeguards be put in place.

For information or support regarding domestic violence:

- Call 9-1-1 in emergency situations
- Trans Lifeline: 1-877-565-8860

- Contact the Employee Assistance Program (if the principal party is in physical danger, or there are children in the home, EAP is obligated to inform the local police)
- Access <u>Shelter Safe</u>, which helps women and their children seeking safety from violence and abuse by connecting women with their nearest shelter
- Learn more about stopping family violence, and find supports and services in your area.
- For help dealing with family violence
- About family violence
 - Promoting safe relationships
 - What provinces and territories are doing

10. Emergency Procedures

In the event of an emergency situation, the Corporate Security Officer (CSO) and/or supervisors are responsible for

- calling the 911 emergency services and/or contacting the on-duty guard when a situation is deemed life-threatening or a threat to individual safety; and
- in consultation with the OHS Workplace Committee or HS Representative, develop in writing, implement, and post at a location readily accessible to the employees, the procedures for summoning assistance in both emergency and non-emergency situations where immediate assistance is required in response to workplace violence.

The Corporate Security Officer (CSO) is responsible for providing police and emergency services liaison wen emergency services are on-site.

Note: It is important to note that employees or persons granted access to Agency workplaces who witness an incident and/or feel threatened should call the 911 emergency service and/or contact the on-duty guard or the Corporate Security Officer when a situation is deemed life-threatening or a threat to individual safety.

11. Privacy

Confidentiality

All persons involved in a complaint of disrespectful behaviour or harassment must recognize the seriousness of such situations and respect the sensitivity and confidentiality of the process and the privacy of the persons involved. Individuals must refrain from discussing the situation with persons not involved in the process or who are not relevant to the case. Every effort must be made to preserve the dignity and respect of all parties concerned and the integrity of the complaint process.

Individuals who fail to maintain the confidentiality of the process may be subject to disciplinary or administrative measures after a consultation with Labour Relations.

12. Other Recourse Mechanisms

The following alphabetical list of resources offer other recourse mechanisms. Please refer to Appendix C for additional information.

- Canadian Human Rights Commission
- Civil Court
- Criminal Court
- Grievance (harassment, discrimination, violence)
- The Labour Program (part of the Employment and Social Development Canada portfolio)
- The Public Sector Integrity Commissioner
- Worker's Compensation Boards

13. Support Measures

Information will be made available to employees respecting the medical, psychological or other support services that are available within their geographical area. This includes, but is not limited to:

- Bargaining Agents
- Employee Assistance Program (EAP)
- Mental Health Ombudsperson
- Office of Workplace Conflict Management
- Corporate Occupational Health and Safety Unit

Please refer to Appendix E for additional information on resources available for Agency's employees.

14. Glossary

Applicable Partner – A reference to the "applicable partner" is to be read as a reference to the National Policy OHS Committee or, if there is no National Policy OHS Committee, as a reference to the OHS Workplace Committee, or the Health and Safety Representative.

Bad Faith – Brought with an ulterior motive: for example, motivated by ill will, hostility, malice, personal animosity, lack of fairness or impartiality, lack of total honesty such as withholding information. It includes serious carelessness, recklessness and intentional fault. It can be established by direct or circumstantial evidence.

Corporate OHS Team – Employees in Human Resources who perform the role of providing OHS guidance and monitoring to IAAC employees at all levels in all roles.

Designated Recipient – A work unit in a workplace or person that is designated by an employer under section 14.

Employee – Any person employed by the Agency.

Frivolous – Lacking a legal basis or legal merit; a matter that has little prospect of success; not serious, not reasonably purposeful.

Occurrence – An occurrence of harassment and violence in the workplace.

OHS Policy Committee – The OHS Policy Committee is the national committee that addresses issues that, because of their nature, cannot be effectively dealt with by OHS Workplace Committees or Health and Safety Representatives. OHS Policy Committees strengthen the internal responsibility system by ensuring consistency across the Agency's work sites.

Principal Party – An employee or employer who is the object of an occurrence.

Responding Party – The person who is alleged to have been responsible for the occurrence in notice of an occurrence provided under subsection 15(1).

Supervisor – An employee who has the responsibility for day–to–day supervision of other employees, e.g., assign work, set priorities, assess performance, and approve or recommend approval of leave. (source: <u>Directive on Performance Management</u>)

Trivial – Trifling; inconsiderable; of small worth or importance. Trivial does not require an assessment of reasonableness of the matter.

Vexatious – Without reasonable or probable cause or excuse; harassing; annoying; instituted maliciously or on the basis of improper motives; intended to harass or annoy.

Witness – A person who witnessed an occurrence or is informed of an occurrence by the principal party or responding party.

Workplace - Any place where an employee is engaged in work for the employee's employer

Workplace Harassment and Violence – Any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment.

Workplace (local) OHS Committee – The regional employee and employer representatives who monitor, prevent and improve health and safety conditions in the workplace. These invididuals identify potential health and safety issues and bring them to the employer's attention and must be kept informed of health and safety developments in the workplace by the employer.

15. Enquiries

Enquires about this policy should be directed to the Corporate Occupational Health and Safety team of the Agency.

16. References

Treasury Board Policy Frameworks

- Policy on People Management
- Directive on the Prevention and Resolution of Workplace Harassment and Violence

Related legislation

- Canada Labour Code (Part II Occupational Health and Safety)
- Work Place Harassment and Violence Prevention Regulations (WHVP)
- Canada Occupational Health and Safety Regulations (COHSR)
- Canadian Human Rights Act (CHRA)
- Government Employees Compensation Act (GECA)
- Privacy Act

17. Appendixes

Appendix A: Stages of the Resolution Process

Bill C-65 Harassment and Violence in the Workplace Process:

Notification of occurrence

Must be resolved within 1 year (If a party absent > 90 consecutive days, later of 1 year or 6 month after Return to Work)

Resolution of Process

Designated Recipient (person or work unit) receives notice of an occurrence Designated Recipient contacts the principal party and if applicable, the witness, and confirms receipt of the notification

Designated Recipient, principal and responding party must make every reasonable effort to resolve the occurrence and initiate negotiation resolution within 45 days after notice is provided, starting no later than 45th day. If investigated, not after report.

If occurrence is not resolved through negotiation resolution, it may be resolved through two process.

Investigation route: proceed to investigation flowchart

Resolution process is complete

Conciliation Process

If Conciliation is successful, the

process is considered resolved.

If conciliation is unsuccessful, the

principal party must decide if they

wish to continue with the resolution

process through investigation.

If the principal party chooses to

proceed, the occurrence must be

With regard to notification:

- A principal party or witness may notify the designated recipient of an occurrence
- 2) The notification may be provided anonymously
- 3) Notice must contain
 - Name of principal and responding party (if known)
 - b. Date of occurrence
 - c. Detailed description of occurrence

Within seven days after receipt the designated recipient must:

- Confirm to the witness (not anonymous) that the notification has been received if applicable
- Contact the principal party to confirm receipt of the notification / inform them of receipt of the notification from a witness if applicable
- 3) Inform the principal party of the manner in which the workplace harassment and violence prevention policy is accessed
- 4) Explain to the principal party each step of the resolution process
- 5) Inform them that they may, at any time be represented during the resolution process.

Monthly status updates must be provided to the parties following notification.

Reasonable efforts includes a review by principal party and employer or Designated Recipient to determine whether the notice meets the definition of H&V (resolved if not). This also includes efforts at early resolution.

If the complaint meets the definition and efforts at early resolution fails, the principal party has a choice to complete the resolution process through either:

- 1) Conciliation (mediation)
- 2) An Investigation

If early resolution fails, this is the point at which the respondent must be contacted.

In the event of conciliation, both parties must agree on the facilitator.

violence means any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical

Definition: harassment and

or psychological injury or illness to an employee, including any prescribed action, conduct or comment.

ongoing.

*The Regs do not prohibit the principal and responding party from engaging in negotiated resolution or conciliation while an investigation is

investigated

*If the occurrence being investigated is resolved before investigator has provided their report, the investigation must be discontinued.

The resolution process is considered complete if:

- Occurrence does not meet the definition of HV or reasonable efforts/the conciliation is successful.
- The principal party chooses, at any time not to proceed with the resolution process and the employer reviews and updates the workplace assessment.
- For the investigation route, once the investigation is completed, reports provided, and recommendations implemented.

Bill C-65 Investigation Process Resolution of Notification of 1 YEAR process occurence **Designated Recipient** Pre-Approved List- Designated **Designated Recipient sends** Designated Recipient selects investigator from provides the report to Once the recommendations Recipient selects investigator and Investigator provides the Notice to both principal and jointly developed list OR provides selection of provides investigator with all relevant applicable partner for joint Employer / Designated have been implemented, the responding party that investigators to principal and responding party determination of information and investigation Recipient, with a report. resolution process is closed. investigation will occur. for agreement if no pre-approved list exists. proceeds. recommendations to implement. Parties cannot agree **Designated Recipient** on investigator within requests investigator 60 days.

The Investigator Must:

- 1) Be a person other than the responding party or one who directly reports to the responding party
- 2) Be trained in investigative techniques
- 3) Have knowledge, training and experience that is relevant to harassment and violence in the workplace
- 4) Have knowledge of the Act, the Canadian Human Rights Act and any other legislation that is relevant to harassment and violence in the workplace
- 5) Provide and indicate with a written statement that they are not in a conflict of interest in respect of the occurrence.

The Investigator may be an internal resource.

For each proposed investigator the designated person must provide

- 1) Their name:
- 2) If they are an employee of the employer, their job title and the name of the person they directly report to;
- 3) A description of their knowledge, education and training; and
- 4) A description of any experience they have that is relevant to the nature of the occurrence that is to be investigated.
- The list must be jointly developed or identified by the employer and applicable partner

The Investigator will provide:

from CCOHS.

- 1) A report that does not disclose, directly or indirectly, the identities of the principal party and the responding party and that sets out
 - a. A general description of the occurrence;
 - b. Their conclusions, including those related to the circumstances in the WP that contributed to the occurrence; and
 - c. The recommendations to eliminate or minimize the risk of a similar occurrence.

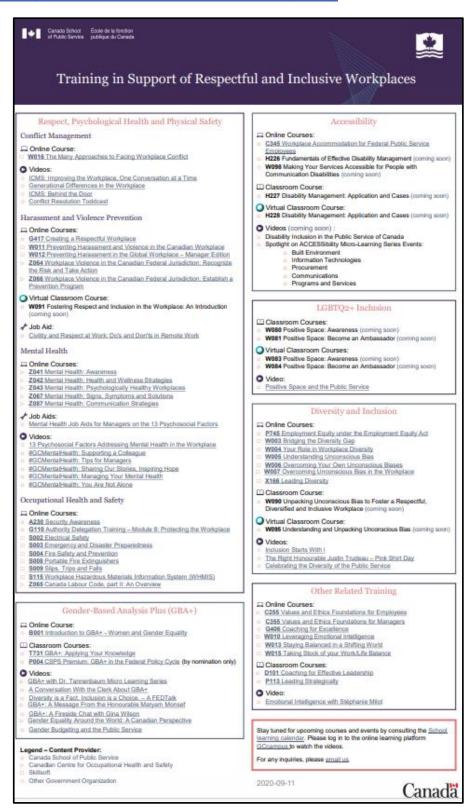
The report must be shared with Principal, responding, Workplace OHS Committee / HS Representative.

Once the summary report has been received:

- 1) The employer and the applicable partner must jointly determine which of the recommendations set out in the summary report are to be implemented.
- 2) The employer must implement all recommendations that are jointly determined.
- 3) The investigation must be completed and the joint recommendations in place within 1 year of the designated recipient being notified of the occurrence.

Appendix B: CSPS Training Options

Courses offered by the Canada School of Public Service (CSPS)



Appendix C: Recourse Options

Available recourse options to address allegations of workplace harassment and violence

	Workplace harassment and violence complaint under the Canada Labour Code, Part II	Discrimination complaint under the <i>Canada Human Rights Act</i> (CHRA)	Harassment and discrimination grievances under the applicable Collective Agreement	Disclosure of serious wrongdoing in the workplace under the <i>Public Servants</i> Disclosure Protection Act
Nature of allegations	Harassment and violence: means any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee.	Discrimination: an action or a decision that results in the unfair or negative treatment of person or group because of their race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability and a conviction for which you have been granted a pardon.	Grievance: With some exceptions, an employee can file a grievance as it relates to their terms and conditions of employment including a grievance alleging violation of the "no discrimination" clause in the applicable collective agreement.	Wrongdoing: relates to serious violations that go against the public interest, such as: violating any Act of Parliament or any Act of the legislatures of the provinces, misusing public funds or public assets; gross mismanagement in the public sector; doing something or failing to do something that creates a substantial and specific danger to the health, safety or life of persons or to the environment, seriously breaching the Treasury Board or your organization's code of conduct or knowingly directing or counselling a person to commit a wrongdoing set out above.
Timelines to file the complaint	No prescribed timelines	One year	25 days following the last event that gave rise to the grievance	No prescribed timelines
Participation requirements	Anonymous complaint can be submitted but occurrence	Parties and witnesses expected to participate and could be compelled if the case is referred to the	Complainant, Respondent and Witnesses may be compelled to testify if the	The employee preferably provides their disclosure of wrongdoing in writing which includes the date and description of the alleged wrongdoing. Your identity and

	cannot proceed to an investigation.	Canadian Human Rights Tribunal.	grievance is referred to adjudication.	other information regarding a disclosure is protected and not disclosed, even after the investigation is completed.
Investigator requirements	 Must not be a person other than a responding party or one who directly reports to the responding party. Be trained in investigative techniques. Have knowledge, training and experience that is relevant to harassment and violence in the workplace. Have knowledge of Canada Labour Code, the Canadian Human Rights Act and any other legislation that is relevant to harassment and violence in the workplace. 	CHRC determines requirements.	No requirements. Could be investigated by management, HR, or a third party.	A neutral and professional investigator may be called upon. Cases concerning criminal activity will be referred to the appropriate law enforcement authority.
Parties privy to the report	Employer, principle party and the responding party privy to final report. The applicable partner privy to summary report.	Complainant, Respondent, Deputy Minister, Corporate LR.	Labour Relations, Grievance Step Officer, and other parties as determined on a case by case basis.	Deputy Minister and delegated human resources officer
Personal remedy available.	No.	No.	No. Unless settlement negotiated in response to grievance.	No.

Can the	No. Separate administrative	Yes.	Yes.	No. Separate administrative investigation
process be	investigation (e.g., fault			(i.e., where wrongdoing is founded and
used as a	finding distinct from health			discipline is recommended, a separate
basis for	and safety framework).			administrative investigation is triggered).
discipline?				

Appendix D: Examples of Workplace Harassment and Violence Behaviours

Workplace **violence** may include but is not limited to:

- Verbally threatening to attack a worker.
- Leaving threatening notes or sending threatening emails to someone at work.
- Shaking a fist in a worker's face.
- Wielding a weapon at work.
- · Hitting or trying to hit a worker.
- Sexual violence against a worker.
- Kicking an object, the worker is standing on, such as a ladder.
- Trying to run down a worker using a vehicle or equipment such as a forklift.

Workplace **harassment** may include but is not limited to:

- Offensive or intimidating comments or jokes.
- Bullying or aggressive behaviour.
- Displaying or circulation offensive pictures or materials.
- Inappropriate staring.
- Repeated offensive or intimidating phone calls, emails or texts.
- Workplace sexual harassment.
- Isolating or making fun of an employee because of gender identity.
- · Sexist remarks.
- · Racist remarks.
- Homophobic remarks.
- Transphobic remarks.

Workplace **sexual harassment** may include but is not limited to:

- Asking questions, talking or writing about personal sexual activities.
- Rough or vulgar humour or language related to sexuality.
- Displaying or circulating pornography, sexual images, or offensive sexual jokes in print or electronic form.
- Leering or inappropriate staring.
- Invading personal space.
- Unnecessary physical contact, including inappropriate touching.
- Demanding hugs, dates, or sexual favors.
- Making gender-related comments about someone's physical characteristics, mannerisms, or conformity to sex-role stereotypes.
- Verbally abusing, threatening or taunting someone based on gender or sexual orientation.
- Threatening to penalize or otherwise punish a worker if they refuse sexual advances.

Appendix E: Need Help! Key Agency Resources

911 Service	Service 911		
In an emergency, call 911 or go to your local	Si c'est une urgence, appelez le 911 ou rendez-		
emergency department	vous à la salle d'urgence la plus proche.		
The Canada Suicide Prevention Service	Service canadien de prévention du suicide		
• Call toll-free 1-833-456-4566 – available	Appelez-nous sans frais au 1-833-456-		
24/7	4566 – en tout temps		
Text with a trained responder – daily from 4 pm to 12 pm at 45,645.	Textez un intervenant qualifié – tous les iours de 16 h à minuit au 45645 (or		
from 4 pm to 12 am, at 45645 • For Quebec residents: 1-866-277-3553	jours de 16 h à minuit au 45645 (en anglais seulement)		
	Pour les résidents du Québec :		
 <u>Canadian Association for Suicide</u> Prevention 	1-866-appelle		
Crisis Services Canada	Association canadienne pour la		
<u>crisis services cariada</u>	prévention du suicide		
	Services de crise du Canada		
Employee assistance program (EAP)	Programme d'aide aux employés (PAE)		
These EAPs are confidential, short-term	Les PAE qui suivent sont des services de		
counselling services for employees or their	consultation confidentiels, à court terme, qui		
families with problems.	s'adressent au personnel ou aux membres de la		
	famille ayant des problèmes.		
Health Canada	Couté Courado		
• 1-800-268-7708	Santé Canada • 1-800-268-7708		
• Website	• Site Web		
Available 24/7 LifeWorks	Disponible en tout temps		
• 1-844-671-3327	SynerVie		
• Website	• 1-844-671-3327		
• Available 24/7	• Site Web		
LifeSpeak	Disponible en tout temps		
Free digital wellness platform	LifeSpeak		
Website (password: Canada)	Plate-forme numérique de mieux-être		
	gratuite		
	• Site Web (mot de passe : canada)		
Informal Conflict Management Services (ICMS)	Services de gestion informelle des conflits (SGIC)		
Confidential services to resolve workplaces	Services confidentiels pour résoudre les		
issues, which include:	problèmes sur les lieux de travail, qui		
• Consultation	comprennent :		
Conflict coaching Solf discovery profile	Consultation Coaching on matière de conflits		
Self-discovery profile Emotional Intelligence Profile	 <u>Coaching en matière de conflits</u> Profil de découverte de soi 		
 <u>Emotional Intelligence Profile</u> Facilitated conversations or mediation 	Profil de decouverte de soi Profil d'intelligence émotionnelle		
 Facilitated conversations or mediation 	From a intelligence emotionnelle		

Learning workshops, tool and resources Please contact Elaine Mignault Website	 Conversation facilitée ou médiation Atelier d'apprentissage, outils et ressources Contactez Elaine Mignault Site web
Ethics	Éthique
If you would like advice on upholding public service values, managing conflicts of interest, and participating in political activities Email	Si vous désirez obtenir des conseils sur la défense des valeurs de la fonction publique, la gestion des conflits d'intérêts ou la participation à des activités politiques Courriel
Disclosure of wrongdoing	Divulgation d'actes répréhensibles
A serious breach of a Values and Ethics Code is one of the definitions of wrongdoing in the <i>Public Servants Disclosure Protection Act</i> . For more information. or to discuss your situation in confidence, contact the Senior Officer for Disclosure by email.	Le manquement grave au Code de valeurs et d'éthique figure parmi les définitions d'un acte répréhensible énoncées dans la Loi sur la protection des fonctionnaires divulgateurs d'actes répréhensibles. Pour obtenir de plus amples renseignements ou pour discuter de votre situation en toute confidentialité, communiquez avec l'agent principal ou l'agente principale responsable de la divulgation par courriel.
Office of the Ombudsman	Bureau de l'ombudsman
An informal, independent, confidential and neutral place to raise any work-related issues: • 613-944-7806, 1-833-225-2881 • Email	Un espace informel, indépendant, confidentiel et neutre pour soulever des problèmes liés au travail : • 613-944-7806, 1-833-225-2881 • Courriel
Labour Relations	Relations de travail
<u>Union Representatives</u> At the Agency: <u>Elaine Mignault</u> , Manager 343-998-2831 <u>Marie-Josée Daigle</u> , HR Advisor, 613-709-4861	Liste des représentants syndicaux À l'Agence : Elaine Mignault, gestionnaire 343-998-2831 Marie-Josée Daigle, conseillère en RH, 613-709-4861