

SISTERING

ANTI-OPPRESSION and DIVERSITY POLICY

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1. Introduction and Overview

1.1 Framework for Anti-Oppression and Diversity Policy ¹

Sistering recognizes that the core challenge with respect to diversity work is not simply a matter of access and inclusion for communities and stakeholders traditionally marginalized based on gender, sexual orientation, race, economic status, language ability, religion preference, age and ability. Issues of power and privilege and underlying, often unspoken, ideologies of domination and subordination often reinforce and maintain our organizational hierarchies, even when actors change.

Diversity is a broad term that refers to the variety of differences among people. Diversity is commonly understood to include differences based on race; age; place of origin; religion; ancestry; Aboriginal status; skin colour; citizenship; sex; gender identity; sexual orientation; ethnic origin; disability/ability; marital, parental or family status; same-sex partnership status; creed; language; educational background; literacy level; geographic location; income level; cultural tradition; and work experience², but is not limited to these.

The principles of inclusion involve a clear recognition that society is not homogenous and diversity is enriching, not a problem. The policy recognizes that ideas and practices based on or modeled after norms of dominant culture or society can result in exclusion and discrimination for a number of people in society. Inclusion, in an organization, requires a strategic process to eliminate barriers and implement change that is based on accepting that many people do not have access to services, jobs and positions of leadership because of societal and systemic factors rather than because of personal deficiencies. This process includes the active and meaningful involvement of people who reflect the diverse groups within a community.³

Oppression occurs when a group (or groups) of individuals use one or more forms of power to suppress another group (or groups) in order to maintain or improve their own economic or social position. Oppression can be overt, for example, the use of police or other bodies to repress a group of individuals, or covert, that is, woven through the social institutions, social relationships and group interactions of everyday life.

Sistering recognizes that a combination of factors and approaches inform an effective anti-oppression and diversity framework. These include knowledge of cultural dynamics, understanding legal responsibilities and a recognition of the impact of diversity on organizational effectiveness. An anti-oppression framework, implemented through culturally competent practice, further recognizes when core culture and institutional structures ought to change and that changes in our personal attitudes are critical as well. It explicitly examines power relationships and sees the parallels, intersections and distinctions between all forms of oppression and the ways in which they manifest themselves. Anti-oppression also recognizes dominant group privilege and internalised oppression and sees the overlap and distinctions between both.

¹ This Analytical Framework for Anti-oppression policy is based on a Discussion Paper from the Centre for Addiction and Mental Health, Toronto

² Adapted from *Inclusive Community Organizations: A Tool Kit* which was produced by the Ontario Healthy Communities Coalition in 2004.

³ Adapted from *Inclusive Community Organizations: A Tool Kit* which was produced by the Ontario Healthy Communities Coalition in 2004.)

1.2 Anti-Oppression/Diversity Policy Statement and Purpose⁴

The purpose of this policy is to foster anti-oppression values and attitudes and develop anti-oppression knowledge and practices, among the Board, staff, volunteers, and program participants within Sistering. Also this policy is to ensure that everyone in the Sistering Community is aware of their right to experience and responsibility to maintain an environment free of discrimination and harassment. Sistering supports the understanding that women from diverse communities contribute to the growth, enrichment and strength of Sistering and of the larger community.

This comprehensive policy is consistent with the aims and objectives of the Canadian *Charter of Rights and Freedoms*, the *Human Rights Code*, and with Sistering's mission and values. Sistering will not tolerate any form of discrimination or harassment as defined in this policy or under the Ontario *Human Rights Code*.

Sistering recognizes that oppressions based on race, ethnicity, creed, class, gender, sexual orientation, gender identity, immigration status, country of origin, religion, mental health status, age, and ability are systemic in Canadian society. They form a system of interlocking oppressions that are mutually enforcing and cannot be addressed in isolation.

Oppressions are so thoroughly embedded in Canadian culture and social institutions that they affect everyone and yet are often invisible. They affect the perception of the world of people who - knowingly or unknowingly - carry oppressive attitudes and stereotypes which make them prejudge individuals and situations. These perceptions lead to behaviours that validate and spread oppressive behaviours.

Oppression prevents equality of opportunity, access to asylum, immigration opportunities, education, jobs, housing, health care and social services, and limits participation in decision-making bodies.

⁴ Drawn on a number of organizational policies, but in particular that of the Access Alliance Multicultural Health Center.

1.3 Anti-Oppression and Diversity Policy Implementation Plan

The purpose of this plan is to provide an implementation strategy for Sistering's Anti-Oppression and Diversity Policy. Our goal is to ensure Sistering operates within an integrated anti-oppression, feminist and woman-centred framework, using the principles of Cultural Competence. Goals, objectives and timetables will be established annually to ensure our agency is reflective, responsive and able to meet the diverse needs of women in the community. We seek to ensure that all members of Sistering's community - including staff, Board, participants, volunteers and community members - are both aware and supportive of our organizational objectives in this area.

The commitment to implementation will include but not be limited to:

- on-going training for all Board Members, staff, volunteers and participants
- accessible programs and services that reflect the diversity of all women
- evaluation of all policies, procedures, programs
- advocacy.

This implementation plan provides information on accountability, the implementation cycle, resources, annual plan and evaluation.

1.4 Accountability

Board and staff are accountable for the implementation of this policy. All members of the Sistering Community are responsible for adhering to Sistering's Anti-Oppression and Diversity Policy.

Board

The Board is ultimately accountable for all aspects of the organization. To this end, the Board direction, policies, vision and planning must integrate principles of anti-oppression and diversity. The Board is responsible to ensure that all Board committees integrate, demonstrate and communicate this commitment in their annual work plans. The Board is responsible to work with the Executive Director to ensure the development, implementation and evaluation of all aspects of the agency against these principles.

Board Committee Responsibilities

Board Development Committee (Membership and Nomination)

- To recruit and retain a diverse board of directors with a commitment to anti-oppression and diversity.
- To ensure that membership policy and process is accessible to all members of the community.
- To plan and implement an on-going Board anti-oppression education program.

Human Resources Committee

- To develop and evaluate Sistering's human resource policies and practices against principles of anti-oppression and diversity.
- To review, in summary, any staff or volunteer complaints that come forward in order to recommend any policy changes.
- To assess and evaluate the Executive Director and, to incorporate implementation of this plan into that evaluation process.

Fundraising

- To develop and support annual fundraising plans that will include the resource needs for the implementation of this plan.
- To ensure all communications and public relations reflect and promote the principles of anti-oppression and diversity.

Staff Responsibilities

The entire staff team is individually and collectively accountable for the implementation of anti-oppression/diversity policies and plans. The following outlines the broad areas of accountability more specifically according to job responsibility.

Staff Positions

Executive Director

- To work with the board to lead the Anti-Oppression and Diversity Implementation Plan and ensure an annual review occurs.
- To proactively build rapport and maintain relationships with relevant and diverse communities, groups or organizations for mutual benefit.
- To oversee and ensure that all managers and staff promote and implement the principles of anti-oppression and diversity in their work plans and daily job activities.
- To oversee and ensure that budget planning supports the anti-oppression plan through the provision of sufficient resources.
- To work with managers to ensure all Human Resource policies and practices are equitable and consistently applied.

Director of Finance

- To ensure that budget planning supports the Anti-Oppression and Diversity Plan through the provision of resources.

Director of Programs and Advocacy, Program Manager and Staff

- To ensure programs are developed and delivered in a culturally competent manner and meet the various needs of a diverse group of women.
- To ensure all program materials are assessed for bias and revised as necessary.
- To consult with participants and with various communities in the program catchment areas on a regular and ongoing basis.

- To identify and eliminate barriers to access and biases in programs, activities and services.

Resource Development Manager

- To develop and support annual fundraising plans that will include the resource needs for the implementation of this plan.
- To ensure all communications and public relations reflect and promote the principles of anti-oppression and diversity.

Volunteer Coordinator

- To ensure that all Volunteer Program policies and practices are both equitable and consistently applied.
- To work towards a volunteer base that is diverse and reflective of the community.
- To ensure all volunteers, particularly program, community and board volunteers, receive anti-oppression and diversity orientation and training.

Office Manager

- To ensure all administrative systems are equitable and consistently applied.
- To ensure that the administrative office and reception areas are open, welcoming spaces for staff, volunteers, program participants and visitors.

1.5 Implementation Cycle

January/February

- Board Committees will review the anti-oppression and diversity achievements of the current year and develop plans and budget needs for the coming year's anti-oppression and diversity work

March/April

- Board reviews and recommends approval of plans and budget in the upcoming year for anti-oppression and diversity work

June

- Annual General Meeting Report by Chair includes report on anti-oppression and diversity implementation plan achievements

September

- New Board Orientation & Training on an area of anti-oppression and diversity work

October

- Board Committees further develop and submit work plans which include strategies and initiatives for anti-oppression and diversity work for the coming year

February

- Annual agency evaluation and review of anti-oppression and diversity implementation
- Every two years, conduct a formal and externally-led program evaluation of all services

Year Round Activities

- Staff anti-oppression and diversity orientation for new staff and volunteers
- On-going training program for staff and volunteers
- Periodic training, orientation for new volunteers, staff and board.

1.6 Resources

Sufficient financial and human resources must be available to implement, maintain and develop the agencies' work in the area of anti-oppression and diversity.

Staff Resources

- Staff time for training and development
- Staff time for community coalition work addressing systemic issues
- Staff time for participation on internal committees and processes

Financial Resources

- Staff and Board training funds
- Funds for relief coverage during staff training and committee work

- Funds allocated annually to ensure accessibility in all areas of agency operations from personnel to programs

Volunteers & Community Resources

- Participate in training, events and sharing of information, skills and experiences

1.7 Evaluation

Each year, the Executive Director will lead a review of our organizational achievements in anti-oppression and diversity. Sistering will establish measures for evaluating our work to date in all areas and establish annual plans for further development. Annual plans will be developed by staff and committees and approved by the Board.

The annual agency review will identify and systemic barriers to access and participation and steps for elimination of these barriers. The evaluation will include both quantitative and qualitative data measured against the goals and timetables set for anti-oppression/diversity organizational change. The following areas will be reviewed or audited:

Governance

- Board and Board committee composition
- Board recruitment, selection, development, retention
- Policy, procedures and positions
- Membership
- Planning and priority setting
- Finances and budget

Human Resources

- Audit of staff composition
- Employment systems including recruitment, selection, development, evaluation, compensation, promotion and retention
- Employment equity policy and procedures
- Workplace harassment policy and procedures
- On-going orientation and training on policies
- On-going anti-oppression and diversity training program
- Resource materials

Programs and Services

- Audit of participant composition
- Physical environment
- Accessibility in the form of assisted devices and translation
- Food
- Program resources reflecting the diversity of program participants.
- Program activities and services
- Participant involvement in agency, training and evaluations
- Community involvement in agency and evaluations

Community Relations & Advocacy

- Community outreach and coalition work
- Advocacy initiatives
- Network of community partners
- Communication
- Volunteer and student program
- Fundraising and community events

1.8 Measures for Evaluation

Governance

- Board and membership reflects community
- Advertising for openings on Board through non-mainstream media
- Employment equity statement appears on all postings
- Nominating committee selection process is transparent and bias free
- Interview process includes questions on anti-oppression
- Orientation and training is provided to all Board members
- Board policies and practices are fair and equitable
- Complaint mechanism and process in place
- Strategic planning will include board leadership and vision in the area of anti-oppression
- Individual and organizational memberships represent community diversity
- Resources are set aside to ensure commitment to organizational change

Human Resources

Recruitment

- Advertising for staff positions through non-mainstream media
- Employment equity statement appears on job advertisements
- All job descriptions have bona-fide job requirements and include educational equivalency

Selection

- Full-time and relief staff reflect community
- Hiring committee and interview and selection process is transparent and bias free
- Interview process includes questions on anti-oppression
- Special programs hiring process is considered when a key aspect of diversity is not reflected in existing staff composition or is a bona fide requirement for a designated position, i.e. speaking a specific language

Development

- All new staff receive orientation and training on all anti-oppression policies
- Training dollars are allocated evenly across the organization
- On-going training in anti-oppression is mandatory for all staff

- Staff have opportunities for both individual and group training
- Outreach time is allocated for staff to network with other community organizations
- Staff time is allocated for internal work related to organizational change
- Training needs and use is evaluated annually
- Anti-oppression and diversity resources are easily available

Performance Appraisals

- Evaluation of job skills that includes integration of anti-oppression analysis
- Involves both employee and supervisor

Compensation

- Job classification system is implemented
- Compensation rates are reviewed annually and set according to the job class system
- Relief shifts are allocated equitably

Promotion and Retention

- Opportunities for promotion through internal processes
- Staff turnover reviewed annually
- Exit interviews completed and forwarded to Human Resources Committee for review

General Human Resources

- Personnel policies and procedures reflect diversity and are barrier and bias free
- Complaint procedure is in place

Programs and Services

- Whenever possible, efforts are made for services and programs to be accessible through the provision of:
 - TTY
 - Translation
 - Sign language and cultural interpretation
 - Transportation assistance
 - Food reflect cultural, racial and dietary needs
 - All materials in plain language
 - New programs and all special events located in physically accessible space
- Types of programs reflect diversity of participants
- Anti-oppression activities and events for participants
- Community referral resources include agencies that reflect and represent diverse communities.
- Program space reflects diversity through resources available, pictures on wall etc.
- Non-dominant religious and cultural celebrations acknowledged and celebrated
- Complaints process in place to deal with issues
- Program resources reflect diverse communities
- Participants are effectively involved in the agency and in evaluation of services and programs

Community Relations and Advocacy

- Broad community participation and feedback
- Community materials state our commitment and are representative of diversity in content and images. This includes:
 - Newsletter
 - Website
 - Annual Report
 - Agency Brochure
- Membership is maintained in coalitions working to end oppression
- Organizational advocacy targets systemic change to end all forms of oppression
- Mailing list reflects diversity in community
- Broad media contact list is maintained
- Volunteers and students reflect community
- On-going training on policies and anti-oppression is provided to volunteers and students

2. Staff and Volunteer Harassment and Discrimination Complaints Procedure

2.1 Overview and Responsibilities

What is harassment?

Harassment is any behaviour that demeans, humiliates, or belittles a person, and that a reasonable person should have known would be unwelcome. It includes actions, comments, or displays. It may be a single incident or continue over time. See the definitions section of this policy for types of harassment and examples. This policy covers both the types of harassment recognized by the Human Rights Code, as well as personal harassment as explained below.

What isn't harassment?

Consensual banter or romantic peer relationships, where the people involved agree with what's happening, are not harassment. Appropriate performance reviews, constructive feedback and critique, counseling, or discipline by a supervisor or manager are not harassment.

Where harassment happens

Work-related harassment can take place in the workplace itself, or outside of the workplace in a situation that is in some way connected to work. For example, employees (and participants) must be protected from harassment during delivery trips, off-site meetings, business trips, and any other event or place related to employment or when the employee is present in the course of employment.

Harassment is against the law

The *Ontario Human Rights Code* protects us from specified types of harassment. Everyone has a right to live and work without being harassed, and if you are harassed, you can do something about it.

Sistering's responsibilities

As an employer, Sistering has a responsibility to be aware of what is happening in the workplace. As Executive Director I commit to treat all incidents of harassment seriously. I undertake to act on all complaints and to ensure they are resolved quickly, confidentially, and fairly. I will discipline or hold accountable anyone who has harassed a person or group of people or who retaliates in any way against anyone who has complained of harassment, given evidence in harassment investigations, or been found guilty of harassment. I will discipline managers who do not act properly to end harassment. At Sistering, we will not condone harassment.

Sincerely,
Executive Director

Our commitment

Sistering is committed to providing a safe and respectful work environment. No one, whether a manager, staff, volunteer, participant, a consultant, or a member of the public, has to put up with harassment at Sistering, for any reason, at any time. And no one has

the right to harass anyone else, at work or in any situation related to employment. This procedure is for the use of staff, including placement students, and volunteers who have reason to file a complaint under the policy. This policy is one step toward ensuring that our workplace is a comfortable place for all of us.

Staff and volunteer responsibilities

All staff and volunteers have the responsibility to treat each other with respect and to refrain from discrimination and harassment. They are encouraged to speak up if they or someone else is being harassed, and are encouraged to report harassment to the appropriate person. All staff and volunteers are responsible for respecting the confidentiality of anyone involved in a harassment complaint.

Managers' responsibilities

Each manager and supervisor is responsible for fostering a safe working environment, free of harassment. Managers must set an example of appropriate workplace behaviour, and must deal with situations of harassment immediately on becoming aware of them, whether or not there has been a complaint. Courts may impose penalties on employers even if they were not actually involved in the harassment. A manager who does nothing to prevent harassment or to mitigate its effects may find herself facing consequences or putting Sistering in legal jeopardy.

2.2 Complaint Procedure

Managers have a responsibility to make sure harassment ends as soon as they become aware of it. Every effort must be made by managers to comply with the timelines described in this procedure, but failure to do so does not void the process. Complainants should be aware that there is a six month time limit for filing a complaint at Sistering and with the Ontario Human Rights Commission unless it is determined that the delay was incurred in good faith and no substantial prejudice will result to any person as a result of the delay.

Throughout this process, the complainant⁵ and the respondent⁶ have the right to be accompanied at any and all times by a support person. The support person is someone who the complainant or the respondent trusts. She will give advice and support to the individual. The support person's role is not to present or respond on behalf of either the respondent or complainant. Rather, she may take notes and give advice to the party she is supporting, when asked by that party. Any interviewing or questioning may also be temporarily stopped in order to allow a support person and her party to discuss an issue or

⁵ The complainant is the individual or group who lodges the complaint and is/are employee(s) or a volunteer(s). Any staff member or volunteer who feels that she has experienced discrimination or harassment from another Sistering staff or volunteer may undertake this process. This includes those who have an act of harassment or discrimination directed at them as well as those who have experienced harassment even though they were not the ones targeted. Under the Ontario Human Rights Code a person's rights may be breached by racial slurs or actions, even when they are not directed toward that individual. Examples of this would be displays of racist, derogatory or offensive pictures, graffiti or materials; demeaning racial remarks, jokes, innuendos about an employee, participant or volunteer; or remarks about a racial group in the presence of any individual, not necessarily a member of the group mentioned.

⁶ The respondent is the individual or group against whom a complaint has been lodged.

question privately. The support person may not be a supervisor of either the complainant or the respondent.

Informal Resolution Process

The complainant may wish to proceed informally at first. She may do this by speaking directly to the respondent within ten working days of the events giving rise to the complaint and asking the respondent to stop her behaviour immediately. In this step of the process the complainant will describe specifically what unwelcome behaviours, statements, or materials are making her uncomfortable. The complainant may seek assistance and/or coaching to prepare herself to speak to the respondent. If the complainant is seeking assistance and/or advice from a manager, the manager may provide coaching, at this point, to facilitate resolution. If either party wants a support person at any point in the informal stage of the process, the support person will be an internal peer.

The respondent must be given an opportunity to stop the behaviour and offer reparation(s) to the complainant.

The complainant has the right to go directly to the formal resolution process.

Mediation

It may be appropriate to attempt to resolve the complaint through mediation before going to a formal investigation. If there is a manager or a qualified person from outside the organization (subject to the approval of the Executive Director) that the complainant and the respondent can agree upon to act as a mediator, that person will begin to help the parties settle the complaint within ten working days⁷ of the complaint and complete the mediation within 20 working days, unless an extension is needed. The mediator should not be involved in investigating the complaint, and should not be asked to represent Sistering at any stage of any proceedings related to the complaint. The mediation will be allocated sufficient time and will take place in a private space.

Either party has the right to refuse mediation, without reprisal. Either party may refuse mediation if they feel they are being pressured into it or if they feel that they are at a disadvantage or vulnerable because of age, sex, race, colour, religion, sexual orientation, economic position, or for any other reason.

Formal Resolution Process

Step 1

⁷ Under this policy, "working day" means any day of the week from Monday to Friday, excluding a statutory holiday and any other day Sistering is officially closed by order of the Executive Director or by virtue of a government order or legislation.

The complainant shall make a written record of the incident, including dates, times, locations and a detailed account of the incident. The complainant will forward the written record of the incident as follows:

- to their direct supervisor unless it is a complaint against their direct supervisor, the Executive Director or a Board Member
- to the Executive Director if it is a complaint against their direct supervisor
- to the Board Chair or the Chair of the Human Resources Committee if it is a complaint against the Executive Director or a Board member.

The respondent will be made aware of the allegations against them and has the right to respond to the complaint in writing.

If the complaint is not against the Executive Director or a Board member, the Executive Director or a designate, which may include an external investigator, shall begin a review, investigation and response to the complaint within ten working days and complete the process within 20 working days, unless an extension is needed.

If the complaint is against the Executive Director or a Board member, the Board Chair or the Chair of the Human Resources Committee will undertake this process or appoint someone to undertake this process on the same time schedule.

The investigator will investigate the complaint thoroughly. She or he will interview the complainant, the respondent, and any witnesses. All staff and volunteers have a responsibility to co-operate in the investigation.

Both the complainant and the respondent have the right to be accompanied by someone with whom they feel comfortable during any interviews or meetings.

An investigation will involve:

- getting all pertinent information from the complainant
- informing the respondent of the details of the complaint and getting her response
- interviewing any witnesses
- providing the complainant and the respondent with enough information about the allegations and responses of the other party or of witnesses to allow them to respond
- deciding whether, on a balance of probabilities, the harassment occurred
- recommending appropriate remedies and penalties.

Once an investigation begins, all parties will be informed that they must not speak with anyone, even those also involved in the complaint, about the complaint. To preserve the integrity of the complaint process, everyone involved is required to cooperate with the investigation and maintain the confidential nature of the complaint.

Before a final report is given, the investigator will give copies of a draft report to the complainant and respondent so they can comment on the accuracy and completeness of the facts. The draft report shall not be shared with anyone other than support persons, if any are involved.

Within a week of completing the investigation, the investigator will report in writing to the Executive Director, or if the complaint is about the Executive Director or a Board member, to the Chair of the Board or the Chair of the Human Resources Committee. The complainant and respondent will also be provided with a copy of the final report. The Board will be provided with a summary of every substantiated complaint, without names or identifiers.

If the complaint is about an employee or a volunteer, the Executive Director will decide what action, including disciplinary action, to take. If the complaint is about the Executive Director or a Board member, the Chair of the Board or the Chair of the Human Resources will bring any recommended action to the Executive Committee of the Board for a decision.

Within thirty days of delivery of the report, the complainant and the respondent will be informed in writing of any decision taken on the report.

Depending on the nature and severity of the harassment, the remedies for a person who has been harassed may include:

- an oral or written apology from the respondent
- restoring lost wages
- a job or promotion that was denied
- compensation for any lost employment benefits, such as sick leave
- compensation for hurt feelings
- a transfer or a reversal of a transfer.

Sanctions for harassers

Depending on the nature and severity of the harassment, sanctions for harassers may include any of:

- written reprimand
- suspension, with or without pay
- transfer, if it is not reasonable for the people involved to continue working together
- demotion
- dismissal.

Harassers may also be obliged to attend an anti-harassment training session. Considering issues of confidentiality, reasonable efforts will be made to support re-integration and recovery for the team.

Unsubstantiated complaints

If there is not enough evidence to support an allegation of harassment, the investigator can not recommend any penalties or remedies.

Complaints made in bad faith

In the rare event that the complaint was made in bad faith, that is made deliberately and maliciously filed knowing it had absolutely no basis, the complainant will be subject to the same possible penalties as a harasser. The person unjustly accused of harassment will

have her reputation restored, and will be given the benefit of any necessary remedies that would be given in a case of harassment.

Retaliation

Anyone who retaliates in any way against a person who has been involved in a harassment complaint will be subject to the same possible penalties as a harasser.

Other options

An employee of Sistering who is not satisfied with the result of a harassment complaint can consult the Ontario Human Rights Commission. If the harassment involves physical or sexual assault, which are both criminal offences, this policy is not the appropriate avenue. The employee should contact the police.

Step 2

If, in their opinion, the investigation process was seriously flawed or the report appears to contain serious inaccuracies, the Executive Director or, in the case of a complaint against the Executive Director or a Board member, the Board, has the option to determine that the investigation is conclusive or to retain a different investigator at their discretion.

Meaning is not clear here: The new investigator should begin to investigate the complaint within 10 working days of receiving it and complete the investigation within 20 working days, unless an extension is needed. Within 10 working days of what?

Confidentiality during a Complaints Process⁸

Confidentiality is an extremely serious issue. Significant personal harm and damage to reputation can come to a party through inappropriate breaches of confidentiality, including harm created by innuendo and gossip. Trust in confidentiality also encourages people to come forward with their complaint.

At the same time, those involved in a complaint have a right to be given enough information so that they are able to respond and to defend their interests. Confidentiality is different from anonymity. An individual complainant that wishes to seek informal or formal resolution must be prepared to be identified to the respondent.

Under this policy, everyone involved in a complaint has a responsibility to ensure confidentiality in all their verbal, written and taped communication, formal and informal, in order to respect the right to fair process for the complainant and respondent.

Anyone can file a breach of confidentiality complaint if they believe that another person has broken confidentiality causing harm to one or both parties.

Release of information

Personal information connected to a complaint will only be shared in connection with administering this policy, investigating and processing the complaint, determining

⁸ adapted from St. Christopher's House Anti-Harassment Policy.

appropriate remedies or sanctions, or for a consistent or related purpose. As well, information may have to be shared if required by law, for example, under a subpoena.

Interim arrangements for supervision and performance appraisal

When interim arrangements, such as for alternate supervision or performance appraisal are requested or appropriate, the Executive Director will make such arrangements in a confidential manner. The Executive Director will only indicate to other relevant persons that a harassment complaint has been made. She will take any action that indicates or reveals the type or content of the allegation.

2.3. Definitions⁹

2.3.1 Discrimination

Under the *Human Rights Code*, “discrimination” is unequal treatment on the basis of a “prohibited ground”, which includes race, sex, sexual orientation, transgender status, same sex partner status, colour, ancestry, place of origin, ethnic origin, marital status, age, disability, citizenship, family status, and religion. Discrimination includes, but is not restricted to, the denial, withholding and delay of access to opportunities, services or facilities, so long as these actions and behaviours are based on the prohibited grounds listed above.

Sistering considers the following as Examples of discrimination include:

- A refusal to hire employees of a particular race, sexual orientation, etc.
- Designated groups, or members of groups, are disproportionately excluded from the decision making process
- Experiences and expertise of ethno-racial groups are not valued by the organization
- A failure to reasonably accommodate employment limitations of an individual which are caused by disability or illness
- Taunting about a person’s clothes, customs, or accent
- Condoning or showing disinterest toward discriminatory or harassing behaviour of others, including individuals outside the scope of the policy

2.3.2 Systemic discrimination

Systemic discrimination refers to policies, practices and procedures that appear neutral on the surface, but function, whether intentionally or not, to exclude or deny opportunities and rights to protected individuals and groups. Some of the examples of discriminatory behaviour above may be the result of systemic discrimination. Employment related systemic discrimination is common in organizations and is normally identified through an Employment Systems Review.

⁹ These definitions come from or are adapted from the policies of Mt. Sinai Hospital and the Center for Addiction and Mental Health Toronto.

Examples of Systemic Discrimination include:

- Recruitment and selection processes and/or criteria that screen out certain groups, unconnected to the job requirements
- Inequitable training or promotion opportunities that result in limiting racialized groups to specific and secondary roles in the organization
- All materials regarding a specific procedure are available only in English, and women who cannot read English are not provided with critical information

2.3.3 Harassment

“Harassment” is behaviour or comments that demean, insult, or offend on the basis of a ground prohibited under the *Human Rights Code*, that is race, sex, sexual orientation, transgender status, same sex partner status, colour, ancestry, place or origin, ethnic origin, marital status, age, disability, citizenship, family status, or religion, where the person knows or ought to know that such behaviour or comments are unwelcome.

Harassment may occur through words, gestures, electronic messages (including, but not limited to, telephone, voicemail, fax or computer messages), innuendoes, graffiti, signs, pictures or other acts.

Examples of harassment include, but are not limited to the following behaviours:

- Remarks, jokes, taunts, or insults about a person or a group of people identified by race, colour, ancestry, ethnic background or any other prohibited ground
- The displaying of racist, sexually suggestive or other offensive or derogatory pictures, cartoons or material
- Insulting gestures or practical jokes based on sexual, racial or ethnic grounds which cause embarrassment or awkwardness
- Insisting that employees only speak English if it does not negatively affect the work being done
- Making ridiculing, taunting, belittling, humiliating or insulting comments;
- Physically intimidating behaviour or threats;
- Use of profane, abusive or threatening language;

Harassment does *not* include appropriate direction, evaluation, appraisal or discipline of an employee by a supervisor or manager.

2.3.4 Personal Harassment

Personal harassment involves excessive, unwelcome behaviour, directed at an individual, not linked to the prohibited grounds, but which is known or ought reasonably to be known to be unwelcome/unwanted, offensive, intimidating, hostile, inappropriate and results in an unhealthy work environment. Personal harassment is sometimes used to pressure people into doing things they do not want to do; sometimes it is a form of bullying.

Examples may include, but are not limited to:

- Ridiculing, taunting, belittling or humiliating another person

- Physically intimidating behaviour and/or threats
- Derogatory name-calling
- Use of profane, abusive or threatening language

Constructive feedback and critique from colleagues or a supervisor does not constitute personal harassment.

2.3.5 Sexual Harassment

“Sexual Harassment” is a course of harassing conduct related to a person’s sex, sexual-orientation, transgender status, same sex partner status, or any sexualized activity that is known or might reasonably be known to be unwelcome, unwanted, offensive, intimidating, hostile, or otherwise inappropriate.

Incidents involving sexual harassment include unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature under any of these circumstances:

- Such conduct might reasonably be expected to cause insecurity, discomfort, offence or humiliation to another person or group
- Submission to such conduct is made either implicitly or explicitly a condition of employment, appointment, approval of privileges, an educational/training opportunity, or receipt of services or a contract
- Submission to or rejection of such conduct is used as a basis for any employment, reappointment, or advancement decision (including, but not limited to, matters of promotion, raise in salary, job security and benefits affecting the employee)
- Such conduct has the purpose or the effect of interfering with a person’s work performance or creating a difficult, intimidating, hostile or offensive work environment

2.3.6 Negative Environment

A negative learning or work environment is created when a member of the Sistering Community makes a comment or a series of comments, or takes an action or series of actions on prohibited grounds of discrimination which have the effect of creating or maintaining an offensive, hostile or intimidating climate for work or learning at Sistering. An individual or group does not have to be a direct target to be affected by a negative environment. Graffiti, signs, electronic messages, cartoons, remarks, exclusion and adverse treatments are examples of actions that can create a negative environment.

2.3.7 Reprisals

All members of the Sistering Community have the right to file a complaint, participate or co-operate in an investigation, provide information relevant to a complaint, or act in any role under this policy without reprisal or threat of reprisal. Retaliation will be treated as harassment and dealt with accordingly when it is taken against an individual who has:

- invoked this policy (whether on behalf of oneself or another individual)

- participated or co-operated in any investigation under this policy
- been associated with a person who has invoked this policy or participated in these procedures.

2.3.8 Frivolous and Vexatious Complaints

For the purpose of this policy, any member of the Sistering Community who makes a frivolous, vexatious, false, or bad faith complaint under this policy shall be treated as having engaged in harassment and dealt with accordingly.

3. Participants' Harassment and Discrimination Complaints Policy¹⁰

3.1 Overview and Responsibilities

Sistering's responsibilities

As a support service, Sistering has a responsibility to be aware of what is happening in the organization. As Executive Director I commit to treat all incidents of harassment seriously. I undertake to act on all complaints and to ensure they are resolved quickly, confidentially, and fairly. I will hold accountable anyone who has harassed a person or group of people or who retaliates in any way against anyone who has complained of harassment, given evidence in harassment investigations, or been found guilty of harassment. At Sistering, we will not condone harassment.

Sincerely,
Executive Director

Our commitment

At Sistering we are committed to providing a safe and respectful environment. No one, whether a participant, manager, staff, volunteer, a consultant, or a member of the public, has to put up with harassment at Sistering, for any reason, at any time. And no one has the right to harass anyone else, at Sistering.

All program participants have the right to respectful, non-judgmental support. Sistering is committed to ensuring that it is a safe place, free from discrimination, violence and harassment. Racism, homophobia, sexism, classism, ableism, ageism or any other form of oppression will not be tolerated by program participants, staff, and volunteers. All participants have the responsibility to treat each other, staff and volunteers with respect and to refrain from discrimination and harassment. They are encouraged to speak up if they or someone else is being harassed, and are encouraged to report harassment to the appropriate person. All participants are responsible for respecting the confidentiality of anyone involved in a harassment complaint.

This procedure is for participants who feel they have reason to file a complaint under this policy. It is one step toward ensuring that our organization is a comfortable place for all of us. If participants feel they have experienced harassment or discrimination at Sistering, they have the right to voice their concerns by using this participants' complaints procedure. This process is not a process to appeal warnings for breaking any other Sistering Policy. Only in very limited circumstances are warnings taken back.

Sistering provides a separate policy for participants to file a complaint of harassment and discrimination because we recognize that although participants are equally responsible for making sure there is Sistering has a harassment and discrimination free environment, participants may not have equal access to resources and capacities. This policy is

¹⁰ Adapted from Nellie's Policy

intended to ensure program participants can file complaints of harassment and discrimination when they feel they have reason to. It can be used to file complaints against participant peers, staff (including placement students) and volunteers.

Harassment is against the law

The *Ontario Human Rights Code* protects us from specific types of harassment. Everyone has a right to live and work without being harassed, and if you are harassed, you can do something about it.

What is harassment?

Harassment is any behaviour that demeans, humiliates, or belittles a person, and that a reasonable person should have known would be unwelcome. It includes actions, comments, or displays. It may be a single incident or continue over time. See the definitions section of this policy (Section 2.3) for types of harassment and examples.

What isn't harassment?

Consensual banter or romantic relationships between participants, where the participants involved agree with what's happening, are not harassment. Appropriate intervention and direction from staff and volunteers is not harassment.

Complaints Procedure

Managers and staff have a responsibility to make sure harassment ends as soon as they become aware of it. Every effort must be made by managers and staff to comply with the timelines described in this procedure, but failure to do so does not void the process.

Participants should be aware that there is a six month time limit for filing a complaint at Sistering and with the Ontario Human Rights Commission unless it is determined that the delay was incurred in good faith and no substantial prejudice will result to any person as a result of the delay.

Sistering will provide any reasonable accommodation required to make this process accessible to participants. This can include, but is not limited to, assistive devices or interpretation.

Informal Resolution Process

Complaints can be resolved informally:

- Speak directly to the person with whom you have the complaint or with any staff on duty as soon as you are able to but at least within 10 working days¹¹. Ask the person to stop her behaviour immediately. Describe specifically the unwelcome behaviours,

¹¹ Under this policy, "working day" means any day of the week from Monday to Friday, excluding a statutory holiday and any other day Sistering is officially closed by order of the Executive Director or by virtue of a government order or legislation.

statements, or materials that are making you uncomfortable. You may get help or coaching to prepare yourself to speak to the person.

- If you are unable to do this, you have the right to speak with the supervisor or Program Manager. If your complaint is about the Program Manager, you have the right to speak with the Program Director and Executive Director. If your complaint is against the Executive Director you can proceed directly to the Formal Resolution Process.
- You have the right to ask a person not involved in the situation – legally called a third party - to speak to the person on your behalf
- The person who you are complaining about – legally called the respondent - must be given an opportunity to stop the behaviour.
- You have the right to go directly to mediation or investigation.

Mediation

It may be appropriate to attempt to resolve the complaint through a process called mediation before going to a formal investigation. In mediation someone listens to both sides of the story and helps to find a resolution.

If there is a manager, staff member or a qualified person from outside the organization (subject to the approval of the Executive Director or Chair of the Board of Directors) that the participant and the respondent – the person whose behaviour is causing the complaint - can agree upon to act as a mediator, that person will begin to help the parties settle the complaint within 10 working days¹¹ of the complaint. The mediator should complete the mediation within 20 working days, unless an extension is needed. The mediator should not be involved in investigating the complaint, and should not be asked to represent Sistering at any stage of any proceedings related to the complaint. The mediation will be allocated sufficient time and will take place in a private space.

Either party can refuse mediation for any reason, without reprisal. Some reasons a party may choose to refuse mediation are if they feel they are being pressured into it, if they feel that they are at a disadvantage or if they feel vulnerable because of age, sex, race, colour, religion, sexual orientation or economic position.

Investigation Process

Participants can request a formal investigation into their complaint. For a formal investigation the participant will **write down what happened** and will also include:

- the date
- the time
- the place
- the names of other people who may have seen what happened.

The Executive Director will appointment an investigator, which may be a staff member, manager, the Executive Director, a member of the Board or an external contracted

investigator. If the complaint is against the Executive Director, the Board Chair or the Chair of the Human Resources Committee will appoint the investigator.

The Investigation

Within 10 working days, the investigator shall begin to investigate the complaint. The investigator will complete the process within 20 working days, unless an extension is needed.

The investigator will investigate the complaint thoroughly. She or he will interview the complainant, the respondent, and any witnesses. All participants, staff and volunteers have a responsibility to co-operate in the investigation.

Both the complainant and the respondent have the right to be accompanied by someone with whom they feel comfortable during any interviews or meetings.

An investigation will involve:

- getting all relevant information from the participant making the complaint (called the complainant)
- informing the person who the complaint is about (called the respondent) of the details of the complaint and getting her response
- interviewing any witnesses
- providing both sides - the complainant and the respondent - with enough information about the allegations and responses of the other party or of witnesses, so that they can respond
- deciding whether the harassment took place
- recommending appropriate remedies, penalties, or other action, but not including employment-related sanctions.

Once an investigation begins, all parties are informed that they must not speak with anyone, even those also involved in the complaint, about the complaint. Everyone involved is required to cooperate with the investigation and to maintain the confidential nature of the complaint so that the complaint process is fair.

The Report

Before a final report is given, the investigator will give copies of a draft report to both sides - the complainant and respondent - so they can comment on the accuracy and completeness of the facts. They can only share the draft report with their support people, if they have chosen to have one.

Within a week of completing the investigation, the investigator will report in writing to the Executive Director, or, if the complaint is about the Executive Director or a Board member, to the Chair of the Board or the Chair of the Human Resources Committee. Both sides - the complainant and respondent - will also be provided with a copy of the final report. The Board will be provided with a summary of every substantiated complaint, without names or identifiers.

Decision on the Report

If the complaint is about an employee or a volunteer, the Executive Director will decide what action to take.

If the complaint is about the Executive Director or a Board member, the Chair of the Board or the Chair of the Human Resources will bring any recommended action to the Executive Committee of the Board for decisions

The complainant and the respondent will be informed in writing of any decision taken on the report, within thirty days of delivery of the report.

The Executive Director decides whether the investigation is conclusive or if a different investigator is needed because the investigation process was seriously flawed or the report appears to contain serious inaccuracies. The new investigation will begin within 10 working days of receiving the report and by completed within 20 working days, unless an extension is needed. In the case of a complaint against the Executive Director or a Board member, the Board will decide if the investigation is conclusive or if a different investigator is needed.

Unsubstantiated complaints

If there is not enough evidence to support an allegation of harassment, the investigator will not recommend any penalties or remedies.

Complaints made in bad faith

In the rare event that the complaint was made in bad faith, which means the participants making the complaint knows it had absolutely no basis, the participants making the complaint will be subject to penalties. The person unjustly accused of harassment will have her reputation restored, and will be given the benefit of any necessary remedies that would be given in a case of harassment.

Retaliation

Anyone who retaliates in any way against a person who has been involved in a harassment complaint, will be subject to penalties.

Other options

Any participant of Sistering who is not satisfied with the result of a harassment complaint can consult the Ontario Human Rights Commission.

If the harassment involves physical or sexual assault, which are both criminal offences, this policy is not the appropriate avenue. The participant should contact the police, and may inform Sistering's staff, Board Chair or management for support.

4. Employment Equity Policy¹²

Sistering is committed to employment equity through Affirmative Action¹³ because employment equity is consistent with the Mission and Values of Sistering and builds on our commitment to Anti-Oppression. Sistering will take pro-active steps to acknowledge and eliminate discrimination against individuals and systemic discrimination in its hiring systems, even when these are unintentional.

Sistering recognizes the need to remedy the effects of past discrimination against specific groups in society and is committed to reversing the historic under-representation of the designated groups of Aboriginal women, women of colour and women with disabilities on its staff.

To this end Sistering will:

1. Remove barriers that lead to discrimination in employment and advancement to women of colour; women with disabilities; First Nations women and women from other marginalized groups. This includes eliminating or modifying all practices and systems that cannot be shown to be necessary job requirements.
2. Establish positive policies and practices designed to remedy the effects of past discrimination against members of the designated groups; this includes setting organizational goals to achieve employment equity by increasing the recruitment, hiring, training, and promotion of designated groups at Sistering. Special programs, as identified under the Ontario Human Rights Code, will be considered when key aspects of diversity are not reflected in the existing staff composition or are not a bona fide requirement for a designated position such as language.
3. Maintain accessibility and accommodation as an organizational priority and reflect this in all aspects of the agency. Reasonable accommodation will be made by Sistering for persons with disabilities, providing there is no “undue hardship”. Sistering will ensure, to the best of its abilities, that the job and workplace are accessible, by reviewing the following:
 - the possibility of redesigning job duties
 - adjusting work schedules
 - providing technical, financial or human support services whenever funding exists
 - upgrading facilities when possible.
4. The employment equity statement will appear on all job postings. In addition to mainstream organizations, Sistering will include diverse organizations and press and media in our recruitment.

¹² This employment equity policy was adapted from the policies of Nellie's, Toronto and Dalhousie University.

¹³ Affirmative Action is policy or a program that seeks to redress past discrimination through active measures to ensure equal opportunity, as in education and employment.

5. Where the existing staff composition under-represents women from the designated groups, select new employees from the designated groups so long as skills and experience are relatively equal.
6. Train all staff, Board and volunteers in the area of anti-oppression and issues of equity.
7. Review all employment systems and evaluate the employment equity policies and practices of Sistering annually. The review will include recruitment, selection, promotion, evaluation, training and termination of all employees.

5. Transgender and Intersex Women Policy ¹⁴

Background

In June 2000, the Ontario Human Rights Commission released its policy on discrimination and harassment because of gender identity. The policy confirms what courts across the country have been saying for some time: Transgender people have the right to equal treatment without discrimination. Under the policy, the Commission will accept complaints of discrimination and harassment based on gender identity, they are considered included under the ground of sex named in the legislation.

Policy

This policy reflects Sistering's commitment to inclusive practices in relation to all transgender and intersex women at Sistering and will ensure that their rights are respected and protected. Sistering will work to promote a climate that is welcoming to trans and intersex women. Conduct from any member of the Sistering community that fosters a hostile environment will not be tolerated.

Definition

Sistering recognizes trans and intersex women to be individuals who are living as, and self-identify as, women.

Procedure

1. Inclusion

Sistering will include trans and intersex women as members in all areas of the organization and as service-users. Refusal to work, or participate in a program with, a trans or intersex service user, volunteer or staff person because they are trans or intersex may result in sanctions.

2. Education

Sistering will continue to increase its knowledge of trans and intersex issues through ongoing staff in-services, the incorporation of trans and intersex issues into volunteer training programs, and awareness workshops for participants.

3. Confidentiality

The trans or intersex status of any and all members of the Sistering community is considered confidential and private and shall not be recorded or disclosed without the express permission of the individual involved.

¹⁴ based on the West Kootenay Women's Association Policy, the Trans Inclusion Policy Manual for Women's Organizations and Orillia Hospital Trans Policy.

4. Accommodation

Sistering will make appropriate bathrooms and changing areas available to trans and intersex women whenever possible. All shared bathrooms will be equipped with latching doors, curtains or other reasonable accommodations to provide privacy in the shared setting. Sistering will offer reasonable support and accommodation for staff and participants who are in the process of transitioning.

5. Guidelines for Behaviour

These are guidelines for all the Sistering community to follow to maintain a positive environment for transgender and intersex women at the agency:

- Use pronouns that are consistent with a person's stated preference; if you don't know their preference, ask.
- Use the name given to you by the person.
- Know that it may be sexual harassment to ask questions about intimate physical details (e.g. have you had surgery?)
- Know that referring to a person's trans status without their explicit permission, is revealing their status and is a breach of their privacy.

6. Glossary

This glossary is provided by the Ontario Human Rights Commission, unless otherwise acknowledged, to provide general information on the terminology related to gender identity. It is not intended to be an exhaustive or authoritative guide on the subject.

Cross-Dresser refers to people who dress in the clothes of the opposite sex for emotional satisfaction and psychological well-being. Cross-dresser is preferred over the term "transvestite" which is seen as a diagnostic term associated with medical identity.

Gender may be defined in various ways and could include any or all of the following categories: physical anatomy (or sex organs), secondary sex characteristics that develop at and after puberty, behaviour and conduct, the mind, and fashion choices.

Gender Identity¹⁵ is an internal felt sense of gender. It refers to the self-image or belief a person has about their gender as being female, male, both or something altogether different. Gender identity answers the question, "Do I experience and understand myself as male, female, or something else?" Gender identity does not always match the (biological) gender at birth.

Intersexed refers to being born with the (full or partial) sex organs of both genders, or with underdeveloped or ambiguous organs. About 4% of all births may be intersexed to some degree. The term "hermaphrodite" is inappropriate and is replaced by this word.

¹⁵ Trans Inclusion Policy Manual for Women's Organizations.

Sexual Orientation is more than simply a status that an individual possesses; it is an immutable personal characteristic that forms part of an individual's core identity. Sexual orientation encompasses the range of human sexuality from gay and lesbian to bi-sexual and heterosexual orientations.

Sex-reassignment surgery (SRS) is the medical procedure by which an individual is surgically altered to create the physical appearance of the opposite sex.

Trans¹⁶ (or transgender or trans-identified)

- 1) There is much debate over the meaning of this word, but generally, it refers to someone whose gender (their internal identity) does not match what society expects of their birth (their body).¹⁷
- 2) For the purposes of applying this policy, Sistering recognizes trans and intersex women to be individuals who are living as, and self-identify as, women.
- 3) A broader definition, however, is that it is a term that can include transsexuals, cross-dressers, drag queens and kings, intersex people, transgenderists, androgynists and other variations and combinations of gender identity and expression. This is a large umbrella that embraces people who cross socially constructed gender boundaries with a gender identity, presentation, or behaviour not typically associated with their perceived, or actual, biological sex. People who describe themselves as trans may not feel, look, dress, or behave in ways expected of women and men in their culture. This inclusive definition also refers to people whose gender identity may match their biological sex, although their gender expression or behaviour is outside socially accepted parameters. Some people who have transitioned from FTM (female to male) or MTF (male to female) no longer consider themselves to be "trans". They may consider being "trans" as a stage of their life and now identify as only men or women.

Transition is the process of changing sex, including hormones, cross living and surgery. A practical minimum duration for this process is about two years but it is not unusual for it to take longer.

Transphobia is the unrealistic or irrational fear and hatred of cross-dressers, transsexuals and transgenderists. Like all prejudices, it is based on negative stereotypes and misconceptions that are then used to justify and support hatred, discrimination, harassment and violence toward people who are transgendered.

Two-Spirit¹⁸ is a term being used by some members of the Aboriginal and First Nations communities to describe a person with both the male and female spirit. It can describe someone's sexual orientation, or their gender identity, or a combination of both. Not everyone who is Two-Spirit would identify themselves as being "trans" in any way.

¹⁶ Trans Inclusion Policy Manual for Women's Organizations.

¹⁷ The Toronto Trans and Two-Spirit Primer by Trans Programming at the 519

¹⁸ The Toronto Trans and Two-Spirit Primer by Trans Programming at the 519

**Sistering
Anti-oppression/Diversity Policy
Employee Commitment Form**

This form is to be completed by all new employees of Sistering at their Orientation process and placed in their personnel file.

I, _____, have read and understood the Sistering Anti-oppression/Diversity policy. I have had an opportunity to ask questions and I am clear about my rights and responsibilities in relation to this policy.

I have read all sections of the policy, which includes the policy framework and implementation plan; the Staff and Volunteer Harassment and Discrimination Procedure; the Participants Harassment and Discrimination Procedure; the Employment Equity Policy and the Transgender Policy.

Date: _____

Employee signature: _____

Supervisor's signature: _____