



BULLYING AND HARASSMENT POLICY PROCEDURES

Policy Statement

IHE School promotes a healthy work environment that is characterized by professionalism and cooperation and will not tolerate discriminatory or personal harassment in any workplace interaction, including those that are verbal, visual, or physical in nature.

Confidentiality

IHE Management will do everything possible to ensure that any matter brought forward is kept confidential. IHE Management will protect the safety of all parties involved in a complaint so only those related to the complaint will be involved in any investigation. If other employees witness the activity or are in the vicinity of when it occurred, IHE Management will take steps to ensure that the incident is not publicized or shared with any other colleagues. This will help protect the parties involved and not interfere with the overall investigation.

All written material or electronic information related to a complaint will be locked in a secure cabinet/office and only available to IHE Management and/or the investigator if not the same person.

Definitions:

"Complainant" is the person who believes they are or have been harassed.

"Respondent" is the person who is alleged to have harassed the complainant.

"Supervisor" is used to refer to supervisor, manager, executive or HR unless otherwise stated specifically.

"The Company" is used to refer to Interior Heavy Equipment Operator School.

To constitute harassment, behavior may be repeated or a single serious incident(s).

"Sexual Harassment" is defined as any unwelcome attention or action of a sexual nature including verbal, visual or physical conduct which has the intent or effect of unreasonably interfering with an individual's or group's work or performance.

Examples include:

- Unwelcome physical gestures or touching
- Display of offensive material
- Sexist jokes that are offensive or embarrassing
- Unwelcome flirtations, advances, propositions
- Leering



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“Personal Harassment and Bullying” is discriminatory behavior, directed at an individual, which causes substantial distress in that person, serves no legitimate work-related purpose and relates to any of the prohibited grounds contained in the BC and AB Human Rights Codes, Bill 14, and WorkSafe BC regulations. This occurs when there is discrimination not related to bona fide terms or conditions of employment associated with race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, or age; or a significant work-related stressor, or a cumulative series of significant work-related stressors, arising out of and during the worker's employment.

Examples include:

- Unwelcome comments about one's race, color, ancestry, gender, place of birth, etc.
- Discrimination or refusal to work with a person for any of the above reasons
- Excessive teasing, practical jokes that cause awkwardness or embarrassment or personal stress
- Verbal aggression or yelling
- Humiliating actions or practices
- Hazing
- Spreading malicious rumors
- Using derogatory names towards someone
- Verbal or physical threats, or
- Implied threats or actions that do not serve any useful workplace purpose.

More specifically, harassment occurs when:

- the conduct creates an intimidating, hostile, or offensive work environment.
- the conduct unreasonably interferes with an employee's job performance.
- submission to, or rejection of such conduct is used as a basis of employment decisions; or
- submission to such conduct is made a term or condition of employment.

The above definitions of harassment must be directly related to work or incidents in the workplace or where company business is being conducted and are not meant to inhibit free speech provided it is respectful, or interactions or relationships based on mutual consent or normal social contact between employees.

Harassment is in no way to be construed where there is the proper delegation of supervisory duties, including the assignment of work responsibilities, the administration of discipline or other actions or communications associated with the operation of the Company. Neither is this policy meant to inhibit free speech or interfere with normal social relations, nor does it apply to situations that occur outside of company property.



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Procedures

If an Employee Believes They Are/Have Been Harassed:

- Tell the person to stop and/or that their behavior makes you uncomfortable.
- Write down as accurately as possible, what occurred, when, who was involved.
- Speak with a supervisor, manager and/or HR.
- Note that to proceed to the investigation stage, complaints must be in writing.
- A complaint must be filed within 5 working days of the incident.
 - Only those parties directly related to the incident can file a complaint.
- Management will determine the person most appropriate to conduct the investigation based on the department and organizational role of the parties involved.
 - The investigator will not be the direct manager or supervisor of any parties involved in the investigation.

Resolution Process

1. If an employee has experienced or witnessed any form of harassment, they should use the following procedure:
 - a. Deal with it immediately. It is essential they advise the harasser that their behaviour is inappropriate and should cease immediately. If, however, the complainant prefers not to discuss the matter with the alleged harasser, or if the respondent fails to respect the request above, the incident should be reported immediately. This may be done directly with the immediate supervisor or manager, other member of management or Human Resources. If the matter is resolved to the complainant's satisfaction, the matter will be closed.
 - b. If the matter is not resolved to the complainant's satisfaction, they may then file a formal written complaint to Human Resources hr@iheschool.com.
2. Formal written complaints should be completed on the Bullying and Harassment form and include the following information:
 - a. the names of the person(s) involved.
 - b. a detailed description of what happened and what was said.
 - c. dates of the incident.
 - d. names of witnesses; and
 - e. any prior attempts to resolve the situation.
3. Provided there is authorization from the complainant, the incident(s) will be promptly investigated by HR or an external investigator depending on the severity of the allegation and who is involved. Every effort will be made to have Investigations completed 30 days of the complaint being reviewed.
 - a. Investigations will be conducted in an objective fact-finding manner. Generally,



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an investigation will take the form of separate interviews with the complainant and the respondent. If other people observed the incident or are involved, they too will be interviewed.

- b. Investigations will be conducted in a fair, unbiased, and timely manner. Those being interviewed will be advised of the procedures available to them. Any person alleged of harassing another employee will receive a copy of the complaint(s). Respondents will have the opportunity to explain their interpretation of the situation.
 - c. Once the investigation is complete, a report, including recommendations will be submitted to the Chief Operating Officer, COO.
 - d. Upon receiving the report and recommendations on the case, the COO may impose an appropriate sanction, provide a remedy for the complainant, or exonerate the respondent. The decision will consider the following:
 - i. the facts surrounding the incident.
 - ii. the severity of the incident.
 - iii. whether the harassment was intentional or not.
 - iv. whether the respondent expressed remorse over the incident.
 - v. whether the offence was an isolated incident or part of an overall pattern.
 - vi. other mitigating circumstances.
 - vii. the respondent's past work record; and
 - viii. Company Code of Conduct.
 - e. The President will determine any disciplinary action if required and inform the complainant and respondent of the outcome of the case.
4. Retaliatory action directed toward the complainant will not be tolerated.
5. Frivolous or vexatious complaints will not be tolerated.

Appeal Procedure

In extraordinary circumstances, we will engage an independent external expert to assist in resolving harassment complaints that are not addressed through the above process.

ACKNOWLEDGEMENT

By signing below, I acknowledge that I have read, understand, and agree to abide by the above conditions.

Printed Name

Signature

Date

*This original document will be kept on record in the employers HR file.



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Responsibilities

All employees of IHE School have a role in building a healthy workplace free of harassment and bullying. To ensure that, employees must:

- Comply with the Bullying and Harassment Policy and not participate in discriminatory or inappropriate behaviour,
- Ensure they understand the Policy and ask questions of IHE Management if they are unclear on any part of the Policy,
- Attend any scheduled training sessions designed to educate the employees on bullying and harassment.

IHE Management will set the tone for the workplace by being role models for other employees and follow these guidelines:

- Conduct themselves in a professional manner and not participate in any discriminatory or inappropriate behaviour,
- Follow the Bullying and Harassment Policy,
- Ensure that employees are aware of the Policy and review it on a regular basis for revisions and any updates to staff,
- Treat all complaints as serious and take action, when necessary, especially if they witness harassment personally,
- Report any incidents of harassment to another IHE Manager so determination of action can be made.

Please note that any person that is witness to harassment or inappropriate behaviour should report the incident to an IHE Manager, however this thorough process will only be undertaken if the complainant themselves files a formal complaint.

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