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| **Title**: **Synterra Security Solutions LP**  **Harassment & Discrimination & Violence & Aggression**  **Policy and Procedures & Controls** | **Policy and Procedures**  **Issue Date: 03/09**  **Revision Date: 01/19** |
| **Approved By:** | **Scott McIntosh /Vice President** |
| **Location: All facilities and Job sites** | |

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| **Purpose** |

Synterra Security Solutions LP has zero tolerance for workplace harassment of any kind, and will be proactive in the prevention of workplace harassment. Synterra is committed to:

* Investigating reported incidents of harassment of any kind, whether it arises from another employee or any other person on the premises, or interacting with staff.

The policy will ensure that:

* Individuals are aware of, and understand that acts of harassment are considered a serious offence for which necessary action is imposed;
* Those subjected to acts of violence or harassment are encouraged to access any assistance they may require in order to pursue a complaint; and
* Individuals are advised of available resources if they are subjected to, or become aware of, situations harassment.

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| **Definitions** |

**Unlawful Discrimination**

Prohibited ground of discrimination with respect to employment are defines by the Ontario Human Rights Code as being: race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability.

**Disability**

Disability means that a person has, or has had, or is believed to have had:

1. Any degree of physical disability, infirmity, malformity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and without limiting the generality of the foregoing, including diabetes, mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheel chair or other remedial appliance or device;
2. A condition of mental impairment or developmental disability;
3. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
4. A mental disorder, or,
5. An injury or disability for which benefits were claimed or received under Workplace Safety and Insurance Act.

Harassment means:

Harassment means “engaging in a course of vexatious comment or conduct against a worker that is known or ought reasonably to be known to be unwelcome.” Harassment includes sexual harassment and workplace sexual harassment.

Harassment based on any of the prohibited grounds under the Ontario Human Rights Code is considered discrimination. Other forms of workplace harassment are considered inappropriate and detrimental to a positive working environment and will not be tolerated.

Examples of harassment may include, but not limited to:

1. Unwelcome, offensive, or intimidating remarks, jokes, insults, nicknames, innuendo, or taunting;
2. Bullying or aggressive behavior
3. Repeated offensive or intimidating phone calls, emails, texts, or postings on social media sites;
4. Displaying or circulating posters, notices, bulletins, or electronic photos which cause offence and encourage discrimination, or create a hostile environment;
5. Racial or ethnic slurs, and use of terminology that reinforces stenotypes based on prohibited grounds;
6. Abuse of supervisory authority that endangers a person’s employment, work performance or interferes or negatively influences the person’s career. This includes misuses of power including intimidation, threats, blackmail and coercion;
7. Public humiliation or degrading behavior to a subordinate or co-worker;
8. Swearing at, or yelling at a subordinate or co-worker in an aggressive manner;
9. Continuing onstage behavior (as part of character portrayal) outside of the rehearsal or performance context.

What is not considered harassment:

1. Reasonable action or conduct by manager or supervisor relating to the management and direction of workers or the workplace, even if there are possible unpleasant consequences for a worker (e.g. disciplinary action, performance management, changes to schedules or duties, implementation of policies, etc.);
2. Differences of opinion or disagreements between co-workers which are handled respectfully.

Sexual Harassment:

Sexual harassment means engaging in a course of vexatious comment or conduct against a worker because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or making a sexual solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. In theatrical context, sexual harassment also includes one, or a series of comments or conduct of a gender-related or sexual nature, outside the boundaries of consent or context.

Specific examples may include, but may not be limited to:

1. Unwelcome, offensive, or intimidating remarks, jokes, innuendos, or taunting about a person’s body, attire or sex;
2. Practical jokes of a sexual nature which cause awkwardness or embarrassment;
3. Displaying pornographic pictures, posters, graffiti or other offensive material;
4. Questions or comments about an individual’s sexual preferences or gender identity;
5. Leering (suggestive starring) or other obscene or suggestive gestures;
6. Unwanted sexual flirtations, advances, or propositions;
7. Unwanted physical contact including touching, kissing, patting and pinching;
8. Persistent unwanted contact or attention following the end of a consensual relationship;
9. Conduct such as stalking;

**Reprisal**

Reprisals or threats of reprisal, whether or not by a person in a position of authority, are defined as acts or threats designed to punish an individual who has reported discrimination or harassment, or who has engaged in an investigation of discrimination or harassment, or who has otherwise exercised their rights under this policy. Reprisal or threats of reprisal also include acts or threats designed to dissuade an individual from reporting discrimination or harassment.

In sexual harassment cases, reprisals can also be defined as acts or threats designed to punish an individual who has rejected sexual advances.

There shall be no reprisal against any individual who, in good faith, reports an incident of harassment or discrimination or participates in an investigation. All reprisals or threats of reprisal ought to be reported immediately.

Synterra Security Solutions LP workplace violence is dealt with through Workplace Violence and Aggression policy and procedure. However, it is important to note that issues of harassment and sexual harassment may escalate over time into threats or acts of violence. Alternatively, a victim of harassment or sexual harassment may react violently to prolonged harassment in the workplace. Workplace violence will NOT be tolerated.

**Prevention and Intervention**

Prevention and intervention are key to achieving an environment free of discrimination and harassment. Synterra Security Solutions LP supports this by providing a clear policy statement and an internal complaint and investigation procedure, and by providing training and communications regarding this policy, as well as the employee and employer rights and obligations.

**Condoning:**

If a person in authority knows, or should reasonably have known, that discrimination or harassment may have occurred and fails to take appropriate action, the person in authority may be found to have condoned the discrimination or harassment and will be subject to sanctions under the policy.

Individuals who observe a situation involving the harassment or discrimination of another or others have a responsibility to inform the harasser of this policy, and report it to their Manager or Human Resources, recognizing that the individuals who experience discrimination or harassment are often reluctant to report it.

**Confidential Consultation & Information**

While Synterra encourages and highlights the importance of reporting violations of this policy directly by the individual experiencing harassment or discrimination, Synterra also acknowledges that at times, an individual may wish to consult with an advisor (e.g. Human Resources, JHSC Member, their direct supervisor) without lodging a formal complaint.

Individuals can obtain information about discrimination and/or harassment and/or Synterra’s policy and processes, obtain assistance or advice, or explore self-help measures (e.g. how the may respond to the harasser directly) on a confidential basis, by contacting any of the advisors listed above.

Individuals may also discuss an incident with the Human Resources Manager without necessarily filing a formal complaint. In some circumstances, however, Synterra may take action and conduct an investigation even when a formal complaint is not filed by complainant.

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| **Violence, Aggression and Policy** |

Workplace Aggression means:

* Engaging in behaviour that is intended to physically or psychologically harm a worker or workers.

Workplace Violence means:

* The exercise or attempt of physical force by a person against a worker in a workplace that causes or could cause injury to the worker,
* A threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Bullying means:

* Aggressive non-physical behaviors perpetrated by organizational members over a prolonged period of time.

Emotional abuse means:

* Another term for bullying

Incivility means:

* Rude or discourteous behavior

The types of violence will be defined as:

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| **Type** | **Definition** |
| Criminal IntentCriminal Intent | Involves a person with no relationship to the workplace, who commits a violent act (e.g. theft, hostage taking/kidnapping, physical assault) |
| Customer/Client | A client with willful intent to cause harm to the employee |
| Employee Related | Employee who engages in repeated and persistent negative acts towards one or more employees resulting in the creation of a toxic or unhealthy work environment |
| Personal Relationship | Relationship violence that occurs at the workplace (e.g. family member that commits a violent act against a worker within the workplace) |

**Responsibilities**

**President/ Vice President**

It is the responsibility of the President Scott McIntosh and Vice President/ Mark King to endure that:

* All reasonable preventative measures to protect employees and others at Synterra Security Solutions LP from workplace violence, aggression and harassment;
* A workplace violence risk assessment is conducted;
* Advise the Joint Health & Safety committee of the assessment results and provide a copy in writing;
* Establish procedures, policies and work environment arrangements to eliminate the risk to employees from violence;
* Proper maintenance and testing of all security systems including, but not limited to, surveillance, cameras, lighting, intercom, etc.
* Ensure all employees are trained on this policy;
* Review the policy annually or as needed with the Joint Health & Safety Committee to ensure any new violence hazards are identified;
* Reporting procedures are established with respect to the workplace violence, aggression and harassment policy;
* Process is in place for responding to, and investigating incidents of workplace violence, aggression and harassment; and
* This policy shall be reviewed after any violent, aggressive or harassment events take place to determine if changes need to be made.

**Managers/Supervisors**

It is the responsibility of Managers and Supervisors at Synterra Security Solutions LP to ensure that:

* This policy is properly enforced, communicated and documented to the employees;
* All employees are adequately trained in procedures addressing workplace violence, aggression and harassment risk factors;
* Encourage employees to report complaints or incidents of workplace violence, aggression and harassment;
* All repots/complaints/incidents of workplace violence, aggression and harassment will be addressed in an appropriate and timely manner; and
* All complaints or incidents of workplace violence, aggression and/or harassment will be reported promptly to senior management and investigated immediately.

**Employees**

It is the responsibility of the employee, or contracted personnel to:

* Comply with this policy and all related procedures at all times for their own protection and the protection of others within the workplace;
* Immediately report any violent or potentially violent incident to their manager/supervisor. In the event of extreme or imminent threat of physical harm to themselves or any person, the worker should contact Emergency service; and
* Fully cooperate in any investigation of complaints or incidents of workplace or harassment as indicated within this policy.

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| **Procedure** |

**Risk Assessment for Workplace Violence**

Besides taking into consideration the general layout/environment of the workplace, the following risk factors will be taken into consideration as well when Synterra Security Solutions LP completes their workplace violence risk assessment.

Working with the public

Carrying out inspection of enforcement duties

Working alone

Working during periods of intense organizational changes (e.g. strikes, downsizing, labour dispute, etc.)

Geographic location

Isolated areas

**Zero Tolerance**

Synterra Security Solutions LP will not tolerate any incidents of workplace violence, aggression or harassment perpetrated against or by any employee, customer vendor, contractor, visitor or any other person. With respect to workplace violence, aggression or harassment as defined by this policy, any contravention may result in the following:

* Removal from property;
* Discipline or dismissal;
* Police or MOL involvement.

All physical assaults involving an employee or occurring at Synterra Security Solutions LP will be reported to the police and/or the MOL. Threats of physical violence will be reported to the authorities, as appropriate.

**Domestic Violence**

Any employee, or knowledge of another employee, experiencing violence outside of the workplace that may create a risk of danger to themselves or others in the workplace is encouraged to report such violence to their manager/supervisor so that the necessary preventative precautions may be taken to protect all employees.

**Sharing Information**

Where Synterra Security Solutions LP acknowledges that a person employed has a history of a violent behavior, Synterra Security Solutions LP will provide the necessary minimum information to any worker who is at risk if they may encounter this person, and is at risk of likely physical injury. Synterra Security Solutions LP will make every effort to respect the privacy of the potentially violent person as much as possible.

**Response to a Violent, Aggressive or Harassment Event or Complaint**

Any employee who observes workplace violence, aggression or harassment, or is a victim thereof, shall immediately go to a safe location and report it to their manager, supervisor, Vice President. At the discretion of management, the police might need to be contacted. In the event that the Vice President is not available, the manager and/or supervisor shall contact the police if they feel it is necessary.

All complaints and incidents are to be recorded in writing using the Violence, Aggression and Harassment Reporting Form, by the reporting person or employee, providing a copy to the supervisor/manager and the Human Resources Department.

One or more of the above managers will promptly carry out an investigation. All reports will be investigated and information will be kept **confidential,** to the extent possible. The results of the investigation will be communicated to the complainant and the accused as soon as possible, but no later than 3 weeks from the time the complaint was made.

Management or the Human Resources Department will undertake:

* A documented interview with the complainant and/or victim;
* A documented interview with the alleged perpetrator(s);
* A documented interview with any witnesses with relevant information to provide; and
* Any other step the investigator(s) deems relevant to the investigation of the complaint or incident.

At the conclusion of the investigation of a complaint or incident, the manager or Human Resources department will provide a written report of the findings and provide any recommendations to prevent a recurrence, to senior management. Following the investigation, the appropriate corrective action will be determined by the Vice President and the manager(s) of the employee(s) involved. There will be no reprisal for any employee making a genuine complaint. However, if it is determined that a false accusation has been made in bad faith, appropriate measure will be taken.

All employees who are subject to workplace violence, aggression or harassment also have the option of pursuing through the Ontario Human Rights Tribunal, The Criminal Code and/or the Ontario Criminal Injuries Compensation Board.

**External Reporting**

See (Injury/Incident Investigation Policy) of the Health and Safety Manual. The WSIB or Ministry of Labour may need to be contacted as stated in the policy. The police may also need to be contacted (if they have not been contacted already) if the conclusion of the investigation involves crimes that fall under the Criminal Code.

**Support**

Synterra Security Solutions LP will provide support victims of violence, aggression or harassment through the employee assistance program (EAP). Employees who are victims of violence, aggression or harassment are encouraged to seek assistance through this program and can be assured that any counselling and/or treatment administered **are completely confidential.**

**Summoning Immediate Assistance**

Emergency numbers are posted at each phone, follow emergency procedures for all occupants under the emergency plan. Off site ensure you follow the sites emergency procedure plan.

**Reprisals**

If any employee engages in workplace violence, aggression or harassment, an investigation will take place immediately. The employee responsible for the violence, aggression or harassment may face discipline, which may include immediate termination. The complainants and witnesses to the acts of violence, aggression or harassment will be protected from reprisals as long as they have acted in good faith and they have complied with the OHSA (Occupational Health & Safety Act).

**Communication and Training**

Synterra Security Solutions LP Workplace Violence, Aggression Prevention Policy Statement shall be posted in the workplace on the Health & Safety Bulletin Board. In addition, all employees including new and returning employees (leave of absence of six months or more) of Synterra Security Solutions LP, as well as managers on all levels will be trained on the contents of this violence prevention policy and program. Senior managers and President/ Vice President shall make themselves aware of all legislation applicable to violence in the workplace in order to take the appropriate steps during and after violent situations Applicable legislation may include the Occupational Health & Safety Act, Criminal Code of Canada, Ontario Human Rights Code and Workplace Safety & Insurance Act.

**Monitoring of the Program**

The Workplace Violence, Aggression and Harassment Policy and program will be reviewed annually or as needed with the Joint Health & Safety Committee to ensure any new violence or harassment hazards are identified and employees are properly protected from these hazards. This policy will be reviewed after any violent events take place to determine if changes need to be made.

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| **Risk Factor** | **Definition** | **Examples** |
| Working with the public | Workers that are working in a public setting | Security at Events, concerts |
| Carrying out inspection of enforcement duties | Workers in remote sites | Security at Mines |
| Working Alone | Workers required to work alone or with very few other workers in a fixed location | Security at Remote sites |
| Working during periods of intense organizational change | Workers required to secure or protect the people or objects that could become a target | Security for Strikes, organizational changes, downsizing |
| Geographic location | Workers required to provide a service in a secluded or remote area | Security for mines, construction sites |
| Securing/protectingvaluables | Workers required to secure or protect valuable goods in transport and /or in a fixed location | Security for Banks, Mines |

**Identifying a Potentially Violent Person**

Signs that a person is potentially violent may include, but are not limited to:

* Their face is turning red or white.
* Their expression is angry, sneering, or glaring.
* They are pacing, making nervous, repetitive, or violent movements, shaking, clenching jaw or fits, approaching too near, or perspiring heavily.
* They are using a loud voice and/or abusive language.
* Their breathing is shallow or rapid.
* If you notice these signs, **TAKE ACTION**. Get help from your Manager and/or Supervisor immediately!

**Communicating with a Potentially Violent Person**

* **DO NOT** confront the person by glaring or starring.
* Remain calm and use a calm manner.
* Speak slowly and clearly in a sure tone.
* **DO NOT** attempt complicated explanations during a tense situation.
* Ask the person to talk and pay close attention.
* **DO NOT** advise the person to relax or be calm.
* Use silence to placate the person.
* **DO NOT** defy, criticize, insult, interrupt or patronize.
* **DO NOT** crowd the person. Allow them about 2 to 4 feet of space.
* **DO NOT** fight with the person. Leave the situation and if necessary, get help from the police.

**Problem Solving with a Potentially Violent Person**

* Try to see the situation from the person’s point of view in order to figure out how to fix the problem.
* **DO NOT** take the situation lightly.
* Direct the person’s attention to the issue.
* Ask the person how to fix the problem.
* Be positive about criticism. If you agree with it, admit this. If you disagree, try to discuss the situation.
* **DO NOT** lie or make unreasonable commitments.
* Make minor requests, such as taking the discussion to a quiet area.
* Divide the problem into smaller chunks and deal with them one at a time.
* Be clear about the consequences of violence and provide other options.
* If the person is an employee, do not discuss discipline until the situation is more stable.
* **DO NOT** immediately turn down the person’s request.
* **DO NOT** try to negotiate with someone who is making threats. End the conversation calmly and if necessary, get assistance.

**Ending an Abusive Telephone Call**

* Interrupt in a courteous but firm tone.
* Make it clear that abusive behavior is not acceptable, and that you will end the conversation if they don’t stop. Report the abuse to your manager/supervisor.
* Halt the call in a courteous but firm tone if the abusive person calls again.
* Make it clear that abusive behavior is not acceptable, and that you will forward the call to your manager/supervisor if they do not stop.
* Put the caller on hold.
* Report the caller to your manager/supervisor.
* Forward the call to your manager/supervisor.

**In the event of a Robbery**

**If you are in a remote setting or on a contracted site**

**Follow all site Rules and Regulations provided by the Site:**

**Follow all Synterra Security Solutions LP Tactical policies**

**Risk Assessment Form**

**Go to OHSCO Workplace Violence Risk Assessment E-Tool at:**

**https://www.pshsa.ca**

References

Preventing Work-Related Aggression & Violence, prepared by the Canadian Centre for Occupational Health and Safety in collaboration with Ontario Service Safety Alliance.

The Industrial Accident Prevention Association (IAPA)

Additional Resources

OHSCO Violence Prevention Series