

 BOARD POLICY	Policy Name: Respectful Workplace	Policy Number: 3.4	
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	Policy Contact (Position): Executive Director	Name of Responsible Committee: Executive Committee	

RESPECTFUL WORKPLACE POLICY PREVENTING ABUSE, DISCRIMINATION, HARASSMENT AND VIOLENCE

1. PURPOSE

The purpose of this attached policy is to foster and uphold a diverse and respectful workplace at the NACC, where the dignity, self-respect, and well-being of all employees and others are prioritized. This policy outlines the expectations for behavior, ensuring that all employees and others contribute to a workplace free of offensive remarks, material, or behavior, whether intentional or unintentional.

The attached policy is intended to meet the requirements for non-profit organizations under [*The Workplace Safety and Health Act*](#) (Manitoba) including [*The Workplace Safety and Health Regulation*](#) (Manitoba), specially Parts 10 and 11 of that Regulation, as well as complying with [*The Human Rights Code \(Manitoba\)*](#).

2. APPLICATION

- (a) The attached policy applies to all Board, staff and volunteers.
- (b) A copy of the attached policy will be maintained and publicly accessible to the NACC offices, at each major event and through the NACC website.
- (c) All Board, staff and volunteers are required to take training available on this subject

3. MONITORING AND REVIEW

This policy will be reviewed every two (2) years by the Executive Committee or more frequently if required to ensure compliance with any changes in workplace health and safety regulations or standards to ensure alignment with the NACC's operations. Changes to the policy will be documented and communicated to the Board for approval.

4. BOARD ACCEPTANCE

This policy will be approved by the Board of Directors. The President / Chair of the Board will sign and date the policy to indicate its approval and adoption.

Reviewed: June 23, 2025

Revisions Approved: June 23, 2025



**RESPECTFUL WORKPLACE POLICY
PREVENTING ABUSE, DISCRIMINATION,
HARASSMENT AND VIOLENCE**

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TABLE OF CONTENTS

1. POLICY

- (a) Purpose
- (b) Objectives
- (c) Commitment
- (d) Respectful and Safe Workplace
- (e) Scope
- (f) Reporting
- (g) Training

2. DEFINITIONS

- (a) "Abuse"
- (b) "Ally" or "Allies"
- (c) "Complainant"
- (d) "Complaint"
- (e) "Discrimination"
- (f) "NACC"
- (g) "Harassment"
- (h) "Microaggressions"
- (i) "Patron"
- (j) "Personal harassment (bullying)"
- (k) "Respectful Workplace"
- (l) "Sexual harassment"
- (m) "Respondent"
- (n) "Toxic work environment"
- (o) "Upstander"
- (p)** "Violence"

3. UPSTANDERS AND ALLIES

4. WHAT TO DO & HOW TO MAKE A COMPLAINT OF ABUSE, DISCRIMINATION, HARASSMENT OR VIOLENCE

5. CONSEQUENCES

6. CONFIDENTIALITY

7. PROTECTION AGAINST RETALIATION

8. STEPS TO ELIMINATE OR MINIMIZE RISK OF VIOLENCE

9. NOTIFICATION OF A RISK OF VIOLENCE

10. WORKPLACE VIOLENCE TRAINING

11. ANNUAL WORKPLACE REPORT (Violent Incidents)

12. ACCOUNTABILITY

13. REFERENCES

INCIDENT REPORT FORM

NORTHERN ASSOCIATION OF COMMUNITY COUNCILS, INC.

RESPECTFUL WORKPLACE POLICY PREVENTING ABUSE, DISCRIMINATION, HARASSMENT AND VIOLENCE

PURPOSE

The purpose of this policy is to foster and uphold a diverse and respectful workplace at the NACC, where the dignity, self-respect, and well-being of all employees are prioritized. This policy outlines the expectations for behavior, ensuring that all employees contribute to a workplace free of offensive remarks, material, or behavior, whether intentional or unintentional.

1. POLICY

(a) Purpose

NACC recognizes every individual has the right to work at and/or attend NACC premises, events and activities in an environment free from abuse, discrimination, harassment and violence, and in which the dignity and self-respect of every person is valued.

NACC also recognizes its responsibility to build and maintain an inclusive and respectful workplace, free from all forms of abuse, discrimination, harassment, including sexual harassment, and violence.

(b) Objectives

The objectives of this Policy are:

- (i) to ensure that all persons covered under this Policy are aware of NACC's commitments and to ensure that certain behaviours will not be tolerated;
- (ii) to ensure that NACC's work/learning environment is free of abuse, discrimination, harassment and violence, so far as it is reasonably practical to do so;
- (iii) to ensure that the NACC community is aware of the actions that will be taken and the measures that will be implemented and enforced to control the risk of abuse, discrimination, harassment and violence in the work/learning environment;
- (iv) to ensure a victim-centered approach is used at all times when dealing with victims of abuse, discrimination, harassment and violence;
- (v) to establish procedures:
 - (a) setting out the steps in place for obtaining immediate assistance when an incident occurs or is likely to occur;

- (b) to be followed in reporting an incident; and to be followed in documenting and investigating any incidents.

(c) Commitment

NACC is committed to providing:

- (i) a respectful and safe workplace and positive working/learning environment that is safe, secure, and free of abuse, intimidation, threats, discrimination, harassment or violence, in which all individuals are treated with respect, dignity and feel valued;
- (ii) a respectful and safe environment that is free from inappropriate behaviours and will ensure, so far as is reasonably practicable, that no individual is subjected to abuse, discrimination, harassment and/or violence while working at or attending an NACC premises, event or activity.

(d) Respectful and Safe Workplace

A respectful and safe workplace requires cooperation and support from each and every individual. Everyone has a responsibility to set a positive example and behave in a manner which will not offend, intimidate, embarrass or humiliate others, whether deliberately or unintentionally.

NACC intends to maintain its commitments by responding with zero tolerance to acts of abuse, discrimination, harassment or violence, which will include investigation and determining of consequences. NACC will not tolerate any form of abuse, discrimination, harassment or violence.

Actions and measures, including training, will be established by NACC with the object to eliminate risk of abuse, discrimination, harassment or violence, or to control that risk if it is not reasonably practical to eliminate it.

(e) Scope

- (i) This policy applies to the workplace itself in addition to activities connected with the workplace such as travel, conferences, work-related social gatherings, training, performance and community interactions; and applies to interactions between employees and interactions between employees, contractors, service providers, partners, volunteers, visitors, students, and Board members.
- (ii) all employees of NACC – regardless of employment status – contractors, service providers, partners, volunteers (which includes members of its Board of Directors), visitors, and students are referred to throughout this policy as ‘employees’ or ‘workers’ or ‘individuals’, interchangeably, as well as inclusively, as the context may require.

NOTE

THIS POLICY DOES NOT APPLY TO NOR LIMIT NACC'S RIGHT TO MANAGE, PERFORMANCE REVIEWS, WORK ASSIGNMENT AND EVALUATION, AND DISCIPLINARY MEASURES TAKEN BY AN EMPLOYER FOR ANY VALID REASON WHICH DOES NOT CONSTITUTE DISRESPECTFUL BEHAVIOUR OR HARASSMENT IN THE WORKPLACE.

- (iii) Individuals who experience abuse, discrimination, harassment or violence should not assume that NACC is aware of the situation.
- (iv) If an individual feels that they are being subjected to abuse, discriminated against, harassed, or are the subject of workplace violence, or have witnessed any such behaviour, the individual is to advise NACC as soon as reasonably possible.
- (v) The procedures for reporting workplace incidents are set out in this policy.
- (vi) Incidents of abuse, discrimination, harassment or violent behaviour can occur on NACC's premises or in the pursuit of activities off NACC's premises. This policy applies to all persons who are employed at NACC, as well as to third parties while they are on NACC's property or are participating in NACC-sponsored or work-related activity, regardless of where the activity occurs.
- (vii) Individuals are at all times required to treat all other individuals they interact with in the course of or as a result of their employment or engagement or involvement with NACC or when attending at NACC premises, event or activity with dignity and respect, whether such interaction occurs during or outside of work hours and inside or outside the NACC workplace, including the office in Winnipeg, any premises where an event and/or activity is being hosted by NACC, or through social media.

(f) Reporting

- (i) All reported incidents will be investigated in a manner that ensures due process as outlined in this policy. NACC will take appropriate action using a victim-centered approach. It is NACC's intent to make individuals feel comfortable about making a report in good faith about situations and circumstances that they have been affected by or witnessed.
- (ii) NACC requires the reporting of all incidents, regardless of who the offender might be (including if the offender is a worker, volunteer, student, parent, patron or visitor). If employees, workers, or any person, regardless of position, is found to have engaged in abuse, discrimination, harassment or violence against any other person, they may be subject to disciplinary action, up to and including termination of employment or engagement. In the case of patrons or visitors, any person found to have engaged in abuse, discrimination, harassment or violence may be subject to removal from all NACC premises, events and activities.

(iii) This Policy and the Incident Report Form (please find the Incident Report Form attached to and forming a part of this Policy) will be posted in a visible location at the NACC office in Winnipeg and in a visible location at all NACC premises, events and activities. This Policy and the Incident Report Form will also be referenced in both print and electronic volunteer materials and will be available on NACC's website for viewing by all employees, workers or other individuals.

(g) Training

- (i) NACC employees, workers, volunteers, students and other individuals within the NACC community will be trained to recognize and effectively respond to behavior which may lead to inappropriate or unwanted conduct by communicating expectations of responsible behavior in the work/learning environment.
- (ii) NACC will ensure employees and workers (including volunteers) are also trained with respect to this Policy, and ensure that employees, workers and volunteers comply with this Policy.
- (iii) NACC shall maintain signed records, in paper or electronic form, on the information, instruction and training provided to each employee, worker, and volunteer with respect to this Policy.

2. DEFINITIONS

In this Policy the following definitions apply whether terms are capitalized or not:

- (a) **“Abuse”** includes the improper use of authority inherent in a person’s position (whether as a member, employee, volunteer, or otherwise) to endanger another person's employment or position, undermine an individual's performance, or in any way interfere with, or influence, another’s position; and can include the mistreatment of a person that causes physical, psychological and/or emotional harm. Abuse can be verbal, nonverbal, psychological, physical, violent and/or personal or sexual in nature. Abuse includes a wide range of behaviours. Some examples of behaviour which constitute abuse within the meaning of this policy are:

- intimidation.
- coercion.
- threats, express or implied.
- requesting personal favours.
- false, inappropriate, wrong, or unsubstantiated statements, or baseless opinions.

Reasonable actions by supervisors to help manage, guide, or direct employees, volunteers, or other individuals in the workplace are not an abuse of authority or harassment. Appropriate performance reviews, assessments, counselling, or discipline is not harassment or an abuse of authority.

- (b) **“Ally” or “Allies”** according to the Canadian Centre for Diversity & Inclusion is a person who works with equity groups to dismantle barriers faced by the groups. An ally uses their position of power and privilege to influence change and work towards creating more equitable environments and solutions for all;
- (c) **“Complainant”** is the person who alleges that they have been subjected to violence, harassment, discrimination and/or abuse by the Respondent;

- (d) **“Complaint”** will generally mean a formal complaint of abuse, discrimination, harassment or violence;
- (e) **“Discrimination”** means any differential treatment, including harassment, of an individual or group on the basis of any of the following protected characteristic(s), rather than on personal merit:
- Ancestry, including colour and perceived race;
 - Nationality or national origin;
 - Ethnic background or origin;
 - Religion or creed, religious belief, religious association or religious activity;
 - Age;
 - Sex, including sex-determined characteristics or circumstances, such as pregnancy, the possibility of pregnancy, or circumstances related to pregnancy;
 - Gender identity;
 - Sexual orientation;
 - Marital or family status;
 - Source of income;
 - Political belief, political association or political activity;
 - Physical or mental disability or related characteristics or circumstances, including reliance on a service animal, a wheelchair, or any other remedial appliance or device;
 - Social disadvantage.
- (f) **“Northern Association of Community Councils Inc. (NACC)”** is a not-for-profit corporation that strives to make both provincial and federal governments recognize and create awareness regarding the needs of our communities.
- (g) **“Harassment”** is any objectionable comment or conduct or course of abusive and unwelcome conduct or comment undertaken or made, on the basis of any protected characteristics defined above or below; and, without limitation, includes any behaviour that degrades, demeans, humiliates, or embarrasses a person, and that a reasonable person should have known would be unwelcome, as well as any actions (e.g. touching, pushing), comments (e.g. jokes, name-calling) or displays (e.g. posters, cartoons); and the behaviour need not be intentional to be considered harassment; and, includes any written or verbal comment, or any physical act or gesture or a display, or any combination of them, that:
- (i) is based on race, creed, religion, colour, sex, sexual orientation, gender-determined characteristics, political belief, political association or political activity, marital status, family status, source of income, disability, physical size or weight, age, nationality, ancestry or place of origin, and that creates a risk to the health and well-being of a person; or
- (ii) creates a risk to the health of a worker or is severe enough to adversely affect a person’s psychological or physical health and well-being and, in the case of repeated conduct, could reasonably cause a person to feel humiliated or intimidated or, in the case of a single incident, has a lasting, harmful effect on a person.

Harassment may occur even if no offence was intended. Harassment may occur when a person hears or sees something that they find offensive even though the person to whom it was directed does not find it unwelcome or does not make a complaint.

Reasonable conduct in respect of the management and direction of employees, workers, volunteers, students or other individuals in the workplace is not considered harassment or discrimination. Reasonable conduct includes, but is not limited to, setting reasonable work expectations, requests to perform work related duties and holding individuals accountable in a respectful manner if expectations are not met.

- (h) **“Microaggressions”** include statements, actions, or incidents regarded as indirect, subtle, or unintentional discrimination against members of a marginalized group (e.g. women; transgender; nonbinary; LGBTQ2S+; racialized; ethnocultural; people with disabilities) that may cause harm or distress over time, and that may contribute to an individual’s experience of harassment, bullying and/or discrimination;
- (i) **“Patron”** is any member of the public who attends or who participates in events hosted by NACC;
- (j) **“Personal harassment (bullying)”** is defined as severe conduct that adversely affects an employee, worker or individual’s psychological or physical well-being. “Severe conduct” is conduct that could reasonably cause a person to be humiliated or intimidated and is repeated or, in the case of a single occurrence, has a lasting, harmful effect on an employee, worker or individual, and can include:
 - (i) unjustified, unfair criticism or ridicule;
 - (ii) insults, mocking, belittling or abusive comments and behaviour, especially in front of others;
 - (iii) repeated incidents of yelling, screaming or name calling, or behaviour that is rude, intimidating or vindictive;
- (k) **“Respectful Workplace”** is a working environment in which all individuals feel valued, safe and supported, and free of abuse, discrimination, harassment and violence;
- (l) **“Sexual harassment”** under this Policy is defined in the Manitoba Human Rights Code as:
 - (i) a series of objectionable and unwelcome sexual solicitations or advances of a sexual solicitation;
 - (ii) an advance made by a person who is in a position to confer any benefit on, or deny any benefit to, the recipient of the solicitation or advance, if the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome; and/or
 - (iii) a reprisal or threat of reprisal for rejecting a sexual solicitation or advance.

It may involve a single event if sufficiently serious. Examples of Sexual Harassment include, but are not limited to:

- behaviour or display of a sexual nature which may reasonably be perceived to create a negative psychological and emotional environment including unwelcome and unsolicited information of a sexual nature, written or verbal material of a sexual nature, the display of sexually suggestive or revealing objects, pictures or cartoons or material that is obscene or denigrating, or unwelcome sexual solicitations or advances, or unwelcome and unwanted sexual remarks or jokes, innuendos, language, or gestures that may or may not denigrate one's gender;
- unwelcome inquiries, questions or comments about a person's sex life or related to another's sexual conduct, or offensive or humiliating behaviour related to a person's gender, or persistent unwanted contact or attention whether after the end of a consensual relationship or otherwise;
- unwelcome physical contact such as inappropriate touching, patting, pinching, grabbing, tickling, etc., or leering; and/or
- _____behaviour that could reasonably be thought to put sexual conditions on a person's job or employment opportunities such as exercising authority or implied or expressed threat of reprisal or promise of reward, or requiring a subordinate employee to submit to sexual activity or comply with a sexual solicitation or advance; or
- _____sexual assault.

All individuals can be victims of sexual harassment.

(m) **"Respondent"** is the person who is alleged to have violated this Policy;

(n) **"Toxic work environment"** means a toxic/poisonous/unwelcome work environment where situations or any or all of these conditions can have the effect of poisoning or making the work environment harmful for everyone. Persons do not have to be a direct target of abuse, violence, harassment or discriminatory behaviour to be adversely affected by a negative environment;

(o) **"Upstander"**, according to the Canadian Museum for Human Rights, is a person who recognizes injustice, knows their personal strengths, power and privilege, and harnesses these to create positive change;

(p) **"Violence"** means:

- (i) _____the attempted or actual exercise of physical force by a person against a person; and
- (ii) _____any threatening statement or behaviour that gives a person reasonable cause to believe that physical force will be used against the person;

For certainty, abuse, discrimination, harassment, and/or violence can be a series of incidents or one severe incident which has a lasting impact on the person; and includes microaggressions or results of a toxic work environment as those respective terms are defined in this Policy.

3. UPSTANDERS AND ALLIES

All NACC employees, workers, volunteers, and students are encouraged to act as upstanders and allies, challenging abuse, discrimination, and harassment, and advocating for fairness for all stakeholders and the broader community.

4. WHAT TO DO & HOW TO MAKE A COMPLAINT OF ABUSE, DISCRIMINATION, HARASSMENT, VIOLENCE

- (a) NACC encourages individuals who may have experienced or witnessed, or otherwise have concerns of, a suspected breach of this Policy to bring such concerns forward in accordance with these procedures. As well, such individuals should keep a detailed written record of the event(s) including the name(s) of the individuals involved, place, date, time, witnesses (if any) and details of the offensive behaviour.
- (b) Where appropriate, in the case of employees, contractors, board members, vendors and volunteers, NACC encourages individuals to attempt to resolve interpersonal workplace issues directly as soon as the issues arise. However, NACC recognizes that addressing such issues directly with another individual can often be uncomfortable and/or unsafe. Therefore, an individual is not required to attempt to resolve workplace issues on their own before initiating an informal or formal complaint under this Policy.
- (c) THIS POLICY PROVIDES FOR BOTH AN INFORMAL COMPLAINT PROCESS AND A FORMAL COMPLAINT PROCESS FOR INDIVIDUALS WHO BELIEVE THEY HAVE BEEN SUBJECT TO ABUSE, DISCRIMINATION, HARASSMENT, OR A THREAT OF VIOLENCE OR ACTUAL VIOLENCE AT AN NACC WORKPLACE OR EVENT.
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IF VIOLENCE OR A RISK OR THREAT OF VIOLENCE EXISTS OR OCCURRED

Individuals who are experiencing or witnessing an act of violence/threat of violence, have experienced or witnessed an act of violence/threat of violence, or believe an incident of violence is likely to occur should take the following steps:

- (i) if an emergency exists and the situation is one of immediate danger, call 911 and take whatever steps are appropriate to protect themselves from immediate harm, including leaving the area;
- (ii) inform their supervisor/manager or the Executive Director, or in the case of patrons and visitors, inform NACC's staff and/or the appropriate NACC volunteer of the incident as soon as possible; and
- (iii) seek any necessary medical attention;
-

Do not ignore threatening or violent behavior. You should report the situation if:

- you experience or witness violence or threat of violence at NACC
- you feel any member of the NACC community is likely to become violent
- you feel that any member of the NACC community is likely to be the target of violence

- (d) Individuals who have been harmed as a result of an incident of violence at NACC premises, events or activities are advised to consult the Individual's health care provider for treatment or referral for post-incident counselling, if appropriate.

- (e) For greater certainty, if a complaint of abuse, discrimination, harassment or violence is made, and both the Complainant and the Respondent are patrons or visitors, this Policy will not apply. Instead, NACC staff and/or the appropriate NACC representative will assess the situation and take whatever steps that they deem appropriate to address the situation including removal of the Respondent from NACC premises, events and activities.

ABUSE, DISCRIMINATION OR HARASSMENT

- (1) If you feel you have been subject to abuse or discrimination or harassment, the first thing to do is to tell the person harassing, discriminating, or abusing to stop, if you feel comfortable doing that. You can do this in person or in writing.
- (2) If you feel unable to deal with the person directly, you can engage in the informal complaint process or the formal complaint process. More information about the formal and informal processes are found in this policy.

VIOLENCE

- (1) If the situation has or is likely to escalate into a physical act of violence, contact the police immediately.
- (2) Report all threats or acts of violence using the informal or formal complaint processes set out in this policy.
- (3) If the incident involves a volunteer or staff member, the Executive Director (or if the incident involves the Executive Director, the Board Chair) will notify the Workplace Safety and Health (“WSH”) Division of Manitoba (or other applicable provincial jurisdiction if relevant) if the incident meets the definition of a “serious incident”. The site of a “serious incident” should not be altered until a representative from WSH or other applicable authority has attended to inspect.
- (4) The Complainant and the Executive Director will complete an Incident Report Form. The Incident Report Form is attached as Appendix A. The form must be completed for all incidents, whether the incident involves a threat or act of violence.

FAIRNESS, DUE PROCESS AND TIMELY RESOLUTION

- (f) All reported incidents will be investigated in a manner that ensures due process as outlined in this policy.
- (g) NACC will take appropriate action using a victim-centered approach. It is NACC's intent to make individuals feel comfortable about making a report in good faith about an incident that they have been affected by or witnessed.
- (h) The complaint will be investigated promptly and thoroughly by an independent party, either within the organization or conducted externally, as determined by NACC.
- (i) An investigation will typically involve interviews of the complainant, the person who is the subject of the complaint, any witnesses identified by either party, and individuals with information relevant to the complaint.
- (j) Measures will be taken to protect the safety and dignity of all concerned. Depending upon the seriousness of the complaint, the person who is the subject of the complaint may be removed from the workplace, denied services, or requested to make no further contact with parties pending the conclusion of the investigation.
- (k) All complaints on reported issues will be dealt with and resolved as soon as reasonably possible.
 - (i) Timelines will be set on a case-by-case basis, and regular updates will be provided to the Complainant and the Respondent including the investigation findings and any resulting corrective action, disciplinary action, and control measures.
 - (ii) Should significant delays in investigations be unavoidable, the Respondent and Complainant will normally be advised.
 - (iii) Following resolution of a reported issue, the immediate supervisor and Executive Director is responsible for ongoing monitoring to ensure this Policy is followed.
 - (iv) NACC may take corrective action respecting any person under NACC's direction.
 - (v) If the complaint involves the Executive Director, timelines will be set on a case-by-case basis by the Board Chair and regular updates will be provided by the Board Chair to the parties involved. In this scenario, the Board Chair will inform the parties of the investigation findings and any resulting corrective action, disciplinary action, and control measures.

INFORMAL COMPLAINT PROCESS

- (l) To initiate the Informal Process, the Complainant should advise their NACC supervisor/manager or the Executive Director, at any time, that they have a complaint under this Policy which they would like to try to address under the Informal Process. Persons who do not have an NACC supervisor/manager should bring any complaints, at any time, to the attention of the Executive Director.

- (i) A supervisor/manager will separately meet with the Complainant and the Respondent (with another NACC staff member or Board member present when appropriate).
- (ii) If a complaint involves a supervisor/manager, they should bring their complaint to the Executive Director. In this case, the Executive Director will separately meet with the Complainant and the Respondent (with another NACC staff member or Board member present when appropriate).
- (iii) If a complaint involves the Executive Director, they should contact the Board Chair. In this case, the Board Chair or a designate appointed by the Board Chair will separately meet with the Complainant and the Respondent (with another NACC staff member or Board member present when appropriate).
- (iv) In the Informal Process, an informal resolution must be agreed upon by both the Complainant and the Respondent.
- (v) Mediation may, where appropriate, be offered by NACC as an option for informal resolution.
- (vi) If an informal resolution acceptable to both the Complainant and Respondent is reached, NACC may document the resolution and place such documentation on the files of the Complainant and Respondent (if applicable).
- (vii) If an informal resolution acceptable to both the Complainant and Respondent is not reached, either the Complainant or NACC may choose to proceed to the Formal Complaint Process.

Individuals do not need to engage in the Informal Complaint Process prior to engaging in the Formal Complaint Process. Moreover, NACC reserves the right to at any time initiate the Formal Complaint Process, whether or not a complaint has been made under this Policy.

FORMAL COMPLAINT PROCESS

- (m) To initiate the Formal Process, an individual should submit to the Executive Director, at any time, a completed Incident Report Form. If an individual has a complaint against the Executive Director, they should submit to the Board Chair, at any time, in writing.
 - (i) The Respondent will then be advised of the complaint and will be given an opportunity to respond in writing.
 - (ii) NACC may attempt to seek a resolution prior to the initiation of a formal investigation. Where a pre-investigation resolution is not appropriate or achieved, a formal investigation will occur.
 - (iii) The formal investigation will be conducted by the Executive Director. The formal investigation may also, where appropriate, be conducted by an external investigator. The formal investigation will typically involve interviews of the

Complainant, the person who is the subject of the complaint, any witnesses identified by either party, and individuals with information relevant to the complaint.

- (iv) Following completion of the investigation, NACC will determine the appropriate course of action, including whether any corrective action (such as, in the case of patrons or visitors, the removal of a patron or visitor from all NACC premises, events and activities), disciplinary action (in the case of employees, contractors, vendors or volunteers), or control measures need to be taken. Where the investigation results in a finding that the complaint is substantiated, the individual conducting the investigation will record the outcome of the investigation and any resulting corrective action, disciplinary action, or control measures in the personnel files of the Complainant and the Respondent. In the event that a contractor, vendor, volunteer, patron or visitor is involved, a file will be created and kept by the Executive Director.
- (v) Where the investigation results in a finding that the complaint is not proved, all records of the complaint shall be removed from the file of the Respondent (if applicable), unless the Respondent chooses to have such records kept in their file.
- (vi) Where the investigation results in a finding that the complaint had been brought maliciously:
 - (1) the Complainant may be disciplined and the outcome of the investigation and any resulting corrective action, disciplinary action, or control measures will be recorded in the files of the Complainant and the Respondent;
 - (2) if the Complainant is a patron or visitor, the Complainant may be removed from all NACC premises, events and activities.

When the investigation is complete, a report will be provided to both the Complainant and the subject of the complaint. Both will be informed of any remedies, disciplinary action, corrective action, or control measures taken as a result.

5. CONSEQUENCES

- (a) If appropriate in the circumstances and acceptable to the parties, a formal complaint that has been substantiated may be resolved on an informal basis, without any formal action being taken.
- (b) A complaint that has been substantiated and not resolved informally will be referred by the Executive Director (or, in the case of the Executive Director, an alternate officer of NACC for appropriate action).

- (c) Persons who are found to be in violation of this policy may be subject to corrective action which may include reprimand, suspension, denial of services, or rescinding of or termination of access to NACC events, or of employment, volunteer relationship, or further communications with or by NACC.
- (d) If a complaint is made against the President or any other director on the NACC Board, all references shall be deemed to be to an alternate designated officer of the Board who is not involved.

6. CONFIDENTIALITY

- (a) Strict confidentiality is required to properly investigate a complaint and to offer appropriate support to all parties involved. Confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.
- (b) NACC will not disclose the name of a Complainant or Respondent or the circumstances related to the complaint to any person except where disclosure is:
 - (i) necessary to investigate the complaint or take corrective action with respect to the complaint, or
 - (ii) required by law.

Any personal information disclosed must be the minimum amount necessary for the purpose.

- (c) Gossiping about a complaint seriously undermines the privacy of all parties involved and will not be tolerated.

7. PROTECTION AGAINST RETALIATION

- (a) Individuals will be protected against retaliation for having made a complaint in good faith or for having participated or cooperated in an investigation under this Policy.
- (b) Retaliation or reprisals of any kind against a Complainant who files a complaint under this policy will not be tolerated. Regardless of the outcome of a Complaint made in good faith, retaliation or reprisals against the Complainant, or anyone providing information in the course of investigating a complaint, is not acceptable. Complaints of retaliation and reprisal will be investigated, and those found to be engaging in retaliatory behavior will be the subject of discipline, up to and including dismissal.
- (c) Frivolous, malicious and/or deliberately false complaints may also result in disciplinary action, up to and including termination. Documentation of such Complaints may be placed in the Complainant's personnel file.
- (d) This Policy is not intended to discourage or prevent a Complainant from exercising any other legal rights, actions or remedies that may be available to that Complainant under any other law. In that regard, an employee has the right to file a complaint of discrimination or harassment with the Manitoba Human Rights Commission.

8. STEPS TO ELIMINATE OR MINIMIZE RISK OF VIOLENCE

- (a) Having consulted with the entire staff, NACC has determined that no risks of violence to an individual would reasonably be expected to occur within the present work areas and job functions.
- (b) Future risks will be dealt with as they are identified in a risk assessment conducted if required.
- (c) Having consulted with the entire staff, NACC has determined that no risks of violence to an individual could reasonably be expected to occur within the present work areas and all NACC premises, events, and activities or job functions.
- (d) Risk assessments, carried out in consultation with staff, volunteers or a committee established for such purpose will occur annually, or more often if something in the workplace changes or a violent incident occurs. Future risks will be dealt with as they are identified in a risk assessment conducted with staff, volunteers or a committee established for such purpose.
- (e) It is generally not expected that individuals will be subjected to violent situations as there have been no incidents of violence that have occurred or may reasonably be expected to occur.
- (f) Notwithstanding, the following measures have been taken or will be taken by NACC to eliminate or minimize the risks of violence:
 - Safe work procedures have been developed or will be developed and reviewed.
 - NACC will train employees, workers, volunteers, students and other individuals about the risks of violence.
 - Documented safe-work procedures on violence prevention shall include:
 - Emergency response plan for employees, workers (contractors, volunteers) and other individuals (students, visitors) – NACC will maintain a first aid kit that will be kept in the office.
 - All injuries must be reported. If necessary, transportation will be arranged for an individual to seek medical attention. For immediate risks and severe injuries, 911 should be called immediately.
 - Working alone or in isolation – employees, workers (including contractors and volunteers) should let each other know when working alone or leaving NACC's office, premises, events or activities.
 - Employees and workers (including contractors and volunteers) are to keep the door to NACC's office locked at all times.
 - In the case of employees (including contractors and volunteers), all individuals will be provided with standards of conduct outlining basic expectations of all who work at NACC to ensure the understanding of behavioural standards. Individuals will be required to review them on an annual basis.

- Volunteer roles are documented with descriptions that indicate the limits of their duties as well as the chain of command available through which to escalate problems.
- All NACC patrons and visitors are provided with Participant Responsibilities that outline public standards of conduct, including that violence, discrimination, abuse and harassment will not be tolerated towards any individuals, including students, and that children should not be left alone.
- Volunteers and employees receive specific additional training in the areas of violence, harassment, discrimination and abuse prevention.
- Any volunteers receive additional training to ensure their understanding of safety protocols.
- Most employees and workers (including volunteers) do not work alone and if they do, there are specific safety protocols of which they will be aware.
- NACC protocols for safety and security-related issues beyond volunteer or employee capabilities engage external enforcement, including the Winnipeg Police Service.
- Contractors, vendors, patrons, and visitors are instructed to seek out an employee or volunteer if they see any incidents.
- Volunteers and employees follow specific protocols for situations, and engage appropriate law enforcement if/when necessary.

On the rare occasions volunteers may work alone, they are given the appropriate support systems and specific protocols to ensure their personal safety.

(g) An Individual may further eliminate or minimize risks by:

- taking all reasonable steps to protect their own personal safety;
- taking all reasonable steps to remove themselves from situations;
- calling for help from another individual or their supervisor/manager when a situation has become one of concern; and
- notifying their supervisor/manager when they have concerns about the workplace.

9. NOTIFICATION OF A RISK OF VIOLENCE

If required, and should circumstances warrant, when an actual incident of violence has occurred or when a situation occurs that could reasonably be expected to become violent, NACC will take the following steps to ensure the safety of all employees, workers and other individuals:

- Advise the employees, workers and other individuals at risk, to the extent this is known;
- Coordinate a review of current procedures in an effort to eliminate or minimize risk;
- Unless otherwise prohibited by law, in informing the employees, workers and other individuals at risk, the information provided to these individuals will include any

information in NACC's possession, including personal information related to the risk of violence from persons who have a history of violent behaviour and whom employees, workers and other individuals are likely to encounter in the course of their work or engagement with NACC. The personal information provided will be the minimum amount required to accomplish the purpose.

- Depending on the circumstances, appropriate steps will be taken to protect the employees, workers and other individuals, as far as is reasonably practicable.

Where a violent situation occurs or appears likely to occur, help should be summoned by calling 911, and employees, workers and other individuals should take all reasonable steps to protect their personal safety and should remove themselves from a violent situation if possible.

10. WORKPLACE VIOLENCE TRAINING

- (a) NACC shall provide information, instruction and training on the factors that contribute to workplace violence and the risks of workplace violence to each employee, worker, and volunteer that may be exposed to a risk of workplace violence.
- (b) NACC shall provide information, instruction and training:
 - before assigning to an employee any new activity for which a risk of workplace violence has been identified;
 - when new information on workplace violence becomes available; and
 - at least every three (3) years.
- (c) The information, instruction and training shall include the following:
 - the nature and extent of workplace violence and how employees may be exposed to it;
 - the communication system established by NACC to inform employees about workplace violence;
 - information on what constitutes workplace violence and on the means of identifying the factors that contribute to workplace violence;
 - the workplace violence prevention measures that have been developed; and
 - NACC's procedures for reporting on workplace violence or the risk of workplace violence.
- (d) Unless otherwise prohibited by law, in providing information, instruction and training on risks of violence, the information will include any information in NACC's possession, including personal information related to the risk of violence from persons who have a history of violent behaviour and whom workers are likely to encounter in the course of their work. The personal information provided will be the minimum amount required to accomplish the purpose.

- (e) At least once every three (3) years, and in either of the following circumstances, NACC shall review and update, if necessary, the information, instruction and training provided:
 - when there is a change in respect of the risk of workplace violence; or
 - when new information on the risk of workplace violence becomes available.

11. ANNUAL WORKPLACE REPORT (Violent Incidents)

- (a) Each year, NACC will prepare a report that compiles:
 - (i) the records of the incidents of violence to an individual;
 - (ii) the results of any investigation into an incident of violence, including a copy of the following:
 - (1) any recommendations for control measures or changes to this Policy;
 - (2) any report prepared under Workplace Safety and Health Regulation, Man Reg 217/2006 section 2.9 in respect of such an incident; and
 - (3) the control measures, if any, implemented as a result of an investigation into an incident.
- (b) This report will be posted at the NACC workplace.

12. ACCOUNTABILITY

- (a) The Executive Director will report to the Board on any significant incidents; and, also, bi-annually, on any workplace initiatives concerning prevention, education and awareness.
- (b) NACC will monitor best practices and research and will review and update this Policy whenever it is reasonably necessary.
- (c) This Policy will be reviewed by the Board at least once every three (3) years, in consultation with the Executive Director and NACC's employees if there is no Respectful Workplace, Safety and Health Committee in place.

13. REFERENCES

- (a) Criminal Code of Canada;
- (b) The Labour Relations Act (Manitoba);
- (c) The Workplace Safety and Health Act (Manitoba);
- (d) The Workplace Safety and Health Regulation (Manitoba);
- (e) The Manitoba Human Rights Code;
- (f) The Accessibility for Manitobans Act.



INCIDENT REPORT FORM

1. GENERAL INFORMATION

Date of incident:	Time: AM <input type="checkbox"/> PM <input type="checkbox"/>
Name:	Job title:
	Department:
Location of incident: <input type="checkbox"/> Office <input type="checkbox"/> Offsite <input type="checkbox"/> Counter / reception area <input type="checkbox"/> Telephone <input type="checkbox"/> Other (please specify) _____	
Type of assault: <input type="checkbox"/> Verbal <input type="checkbox"/> Physical	
2. DETAILED DESCRIPTION OF COMPLAINT	

ALL INFORMATION PROVIDED WILL BE TREATED CONFIDENTIALLY IN ACCORDANCE WITH THE NACC RESPECTFUL WORKPLACE POLICY.

In your own words, please indicate the details of your complaint. If you would like to provide a more detailed description, please attach to this form. Below, please include a description of the incident(s), which include dates, times, places, names of persons directly involved as well as the names of any witnesses.

Please describe what actions, if any, that you have taken to try to resolve this problem.

Please describe the resolution you are seeking.

Incident Report Form

Workplace Safety and Health Division called? ☐ Yes ☐ No

Police called? ☐ Yes ☐ No

Safety Representative notified? ☐ Yes ☐ No

Were you advised to seek medical treatment? ☐ Yes ☐ No

Did you consult a doctor? ☐ Yes ☐ No

Medical attention, first-aid obtained? ☐ Yes ☐ No

Did an investigation occur? ☐ Yes ☐ No

WCB forms completed? ☐ Yes ☐ No

3. INFORMATION ABOUT THE RESPONDENT

☐ Client ☐ Employee ☐ Other (specify):

Name and address of respondent, if known:

Complainant's Name	
Complainant's Department / Unit (if applicable)	
Complainant's phone numbers (work, cell, home)	
Who is the complaint filed against? (Name and position, if applicable, of respondent)	
Date the Incident Report Form was completed on	
Please check to confirm your understanding and agreement <input type="checkbox"/> I UNDERSTAND AND AGREE DETAILS MAY NEED TO BE DISCLOSED TO ENSURE INVESTIGATION AND REPLY	
Complainants Signature:	X

Applicable to:	Employees, contractors, Board members, vendors, volunteers, patrons, and visitors (all)
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