



Workplace Violence, Harassment and Bullying Prevention Policy and Procedure

Version 4.2

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SECURITY MATTERS.™

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Document Version Control

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1 Introduction

1.1 Purpose

The purpose of the Workplace Violence, Harassment, and Bullying Prevention Policy (the “Policy”) is to establish responsibilities, guidelines, and procedures for all employees and contractors of ASP to follow to prevent workplace harassment, sexual harassment, bullying, and violence from taking place.

This policy is established in compliance with applicable employment laws across all jurisdictions in which ASP operates, including but not limited to the **Ontario Occupational Health and Safety Act, Alberta Occupational Health and Safety Act, British Columbia Workers Compensation Act, Manitoba Workplace Safety and Health Act, New Brunswick Occupational Health and Safety Act, Prince Edward Island Occupational Health and Safety Regulations, Newfoundland and Labrador Occupational Health and Safety Act, and the Canada Labour Code, Part 2**. ASP is committed to ensuring compliance with the laws and regulations governing workplace violence, harassment (including sexual harassment), and bullying in all its operations.

A copy of this Policy will be made available to employees on the ASP health and safety boards, Virtual Safety bulletin Boards and from the Human Resources Department upon request.

1.2 Scope

This Policy applies to all ASP employees across all sites, including full and part-time employees, managers, supervisors, contractors, temporary employees, and job applicants (jointly referred to as “employees”).

This Policy applies to all conduct by or toward ASP’s employees in the workplace, virtual office or at any location or event related to work, which may include but not be limited to, work-related travel, training, dealings with clients, partners or suppliers or contractors, social events, and/or social media.

2 Policy Statement

2.1 Principles

ASP is committed to providing a safe and healthy workplace that is free from any workplace violence, bullying and harassment (including sexual harassment). In pursuit of this goal, ASP does not condone and will not tolerate acts of violence, harassment, or sexual harassment against or by any ASP employee, including front-line employees, temporary employees, clients, contractors, and all management personnel.

Accordingly, ASP will make every reasonable effort to ensure that no employee is subjected to workplace violence, bullying, or harassment (including sexual harassment) by other employees, clients, supervisors, or members of the public. All complaints of violence, harassment will be taken seriously and investigated appropriately. ASP will act on complaints pursuant to the procedure to ensure that they are resolved promptly, confidentially, and fairly.

This Policy recognizes ASP's responsibility under the Ontario Human Rights Code, the Ontario Occupational Health and Safety Act, the Alberta Human Rights Act, the Alberta Occupational Health and Safety Act, the Canadian Human Rights Act, and the Canada Occupational Health and Safety Regulations.¹

Specifically, ASP is committed to the following:

- Providing a safe, healthy, and harassment, bullying and violence-free workplace
- Dedicating sufficient attention, resources, and time to address factors that contribute to workplace violence, and harassment, including sexual harassment but not limited to bullying, teasing, and abusive and other aggressive behaviour and to prevent and protect against it
- Communicating to its employee's information in its possession about factors contributing to workplace violence, harassment, and sexual harassment
- Encouraging employees to report all incidents and threats of workplace violence, harassment, bullying and sexual harassment.
- Assisting employees who have been exposed to workplace violence, bullying, harassment, and sexual harassment. ^[OBJ]

2.2 Respect in the Workplace

ASP will make continued efforts to create a respectful workplace by:

- Listening and allowing others to speak
- Being supportive, cooperative, and inclusive
- Expressing differences of opinion constructively and professionally
- Respecting professional boundaries

¹ See 9.7 for references to the specific jurisdiction required.

2.3 Ontario Human Rights Code (OHRC), Alberta Human Rights Act (AHR Act) and Canadian Human Rights Act (CHRA)²

The Ontario *Human Rights Code* (OHRC), *Alberta Human Rights Act* (AHR Act) and *Canadian Human Rights Act* (CHRA) state that employees have a right to freedom from harassment in the workplace by the employer, customer, or by another employee because of any of the prohibited human rights grounds. Harassment on a prohibited ground is a form of discrimination.³

3 Key Terms and Concepts

3.1 Workplace

“Workplace”⁴ means any place where an employee is engaged in business or any place where work-related activities are conducted for ASP. It includes, but is not limited to the physical work premises, **virtual office**,⁵ work-related social functions, work assignments outside our offices, work-related travel, work-related conferences or training sessions.

3.2 Workplace Harassment

“Workplace Harassment”⁶ means engaging in the course of vexatious comment or conduct against a person in the workplace that is known or ought reasonably to be known to be objectionable or unwelcome. Harassment typically involves a pattern of comment or conduct; however, a single incident of a serious nature may be sufficient to constitute harassment. Workplace harassment includes, but is not limited to, psychological harassment and bullying. Including virtually through the use of information and communications technology

² See References 9.7 for further details on how the HR Act’s apply for the applicable jurisdiction.

³ To see the specific Governing Bodies Specific Definition, refer to the resources section 9.

⁴ To see the specific Governing Bodies Specific Definition, refer to the resources section 9.

⁵ Ontario Working for Workers Five Act, Bill 190 Schedule 4 (1), (2), and (3)

More broadly, workplace harassment includes, but is not limited to:

- Psychological harassment – psychological harassment is a vexatious comment or conduct that affects an employee's dignity or psychological integrity and that results in a harmful work environment for the employee. **This can include and is not limited to virtual platform, such as Teams, Zoom, or Google Meeting, as well as social media, including email, Facebook, LinkedIn, X etc.**⁷
- Any vexatious comment or conduct that demeans, belittles, isolates, or intimidates an employee. Workplace harassment can arise in the form of shouting or swearing at an employee, displaying a temper, bullying, spreading rumours or gossip, making jokes or innuendos, displaying or sending offensive material or written communication, etc. However, depending on the seriousness, a single incident can be workplace harassment.
- Workplace sexual harassment

The following conduct does NOT constitute harassment and is not subject to this Policy:

- A reasonable action taken by ASP or management relating to the management and direction of employees or the workplace.
- Differences of opinion
- Minor disagreements between employees or an employee and another person

3.3 Workplace Sexual Harassment

“Workplace Sexual Harassment”⁸ means:

- (a) Engaging in a course of vexatious comment or conduct against an Employee in a workplace 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
- (b) Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the Employee and the person knows or ought reasonably to know that the solicitation or advance is unwelcome
- (c) Including virtually through the use of information and communication technology.⁹

Sexual harassment, including gender-based harassment, may include:

- Unwelcome sexual advances, included repeatedly asking for dates
- Sexually suggestive questions or jokes
- Sharing printed, visual or online material with a sexual theme
- Making unwelcome physical contact
- Calling people sex-specific derogatory names
- Treating someone badly because they don't conform with sex-role or gender stereotypes

⁷ Ontario Working for Workers Five Act, Bill 190 Schedule 4 (1), (2), and (3)

⁸ To see the specific Governing Bodies Specific Definition, refer to the resources section 9.

⁹ Ontario Working for Workers Five Act, Bill 190 Schedule 4 (1), (2), and (3)

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- Leering or inappropriate staring
 - Spreading sexual rumours or gossip (including online)
 - Bragging about sexual prowess
 - Making threats to penalize a person who refuses to comply with sexual advances (known as reprisal)
 - Sexual assault

3.4 Workplace Violence

“**Workplace Violence**¹⁰” means,

- (a) The exercise of physical force by a person against a worker, in a workplace that causes or could cause physical or psychological injury to the worker
- (b) An attempt to exercise physical force against a worker, in a workplace that could cause physical or psychological injury to the worker.
- (c) A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace that could cause physical or psychological injury to the worker

Workplace violence may also be defined as threatened, attempted, or actual conduct or gesture of a person that causes or is likely to cause physical or psychological injury or harm to a worker.

Workplace violence includes, but is not limited to, the following:

- Threatening behaviour – such as shaking fists, destroying property, or throwing objects
- Verbal or written threats – any expression of intent to inflict harm.
- Verbal abuse – swearing, insults, or condescending language.
- Bullying, teasing, and other aggressive behaviour, which are components of psychological violence
- Physical attacks – hitting, shoving, pushing, or kicking. Severe forms of harassment can also lead to or constitute violence (e.g., assault, uttering threats etc.)
- Domestic violence
- Sexual violence
- Intentional damage of property belonging to others

Note: Workplace Violence also includes acts that would be considered offences under Canada’s Criminal Code.

¹⁰ To see the specific Governing Bodies Specific Definition, refer to the resources section 9.

3.5 Domestic Violence

“Domestic Violence” ¹¹means aggressive or violent behaviour perpetrated by a person who has a personal relationship with a worker such as a spouse, former spouse, current or former intimate partner or a family member. A pattern of emotional, verbal, sexual, and/or physical abuse used to control an intimate partner.

Employees experiencing violence that may create a risk of danger to themselves or others in the workplace are strongly encouraged to report such concerns to management so that ASP can take reasonable preventative steps. If an employee becomes aware that domestic violence would likely expose an employee to physical injury in the workplace, ASP will take every precaution reasonable in the circumstances for the protection of its employees.

When ASP becomes aware that domestic violence may expose an employee or others in the workplace to physical harm, the following steps will be taken:

1. Risk Assessment
 - A risk assessment will be conducted to evaluate the potential threat to the employee and others in the workplace. This includes assessing the workplace environment, the nature of the employee's role, and the relationship with the perpetrator.
2. Preventive Measures
 - Based on the risk assessment, ASP will implement necessary preventive measures, which may include:
 - Adjusting work schedules or locations to reduce risk.
 - Enhancing security measures, such as restricted access, surveillance, or increased monitoring.
 - Providing the employee with time off to manage safety or personal concerns.
3. Confidentiality
 - All information related to domestic violence will be treated with confidentiality and shared only with individuals necessary to implement safety measures. ASP will prioritize the privacy of the employee while ensuring the necessary safety protocols.
4. Emergency Response
 - If an immediate threat is identified, ASP will notify law enforcement or emergency responders and take immediate action to protect the employee and others in the workplace.

¹¹ To see the specific Governing Bodies Specific Definition, refer to the resources section 9.

3.6 Bullying

Bullying is usually seen as acts or verbal comments that could psychologically or 'mentally' hurt or isolate a person in the workplace. Sometimes, bullying can involve negative physical contact as well. Bullying usually involves repeated incidents or a pattern of behaviour that is intended to intimidate, offend, degrade, or humiliate a particular person or group of people. It has also been described as the assertion of power through aggression.

4 Immediate Response to Workplace Violence

The safety of every employee is ASP's primary concern. It is important that prompt action be taken in the event of a real or perceived threat to personal safety. As such, nothing in the Policy or this Program should prevent anyone from contacting the police or other emergency responders as appropriate to assist, intervene, or investigate a workplace violence incident.

An employee reporting an injury or adverse symptoms resulting from an incident of violence or harassment is advised to consult a health professional of the worker's choice for treatment or referral.

Employees experiencing any actual or potential situation of workplace violence that could place them in danger shall:

- If it is safe to do so, remove themselves from the situation.
- Immediately report the incident to their manager/supervisor
- Where necessary, dial 911 for emergency services.

4.1 Measures for eliminating or controlling the hazard of workplace violence:

ASP uses many strategies, processes, and technologies to mitigate workplace violence and harassment. ASP uses these mitigation measures according to best practices and worksite requirements or constraints. Examples of controls measures may include, but are not limited to:

- Posted signage
- Restricted access to work areas
- Locked doors
- Key cards
- Security cameras
- Alarms, fencing
- Lighting
- A personal protective device
- Background checks
- Security procedures
- Emergency response procedures

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- Working alone procedures
 - Rearranging of the staff
 - Ensuring effective line of communication
 - Training and awareness
 - Annually review this policy to establish a clear understanding of what anti-violence means.
 - Encourage employees to accept individual differences.
 - Prevent conflicts from turning into harassment or violence.
 - Encourage everyone to report all violent incidents.
 - After any incident or near miss, perform a thorough analysis of the incident and prepare to make changes or additions to the policy.

5 Risk Assessment

Risk assessments shall be conducted in conjunction with the Joint Health and Safety Committee (JHSC) to evaluate the potential for workplace violence, bullying, and harassment (including sexual harassment). These assessments will consider the nature of the workplace, the type of work performed and any specific risks that could contribute to incidents of workplace violence, harassment or bullying.

A risk assessment will be conducted as often as necessary¹² to ensure that the program continues to protect employees from workplace violence and other breaches of the policy.

The methodology used to review the potential risks is broken down into the following four categories:

- **TYPE I** --The offender does not have a legitimate relationship with the business or its employees. General public would be considered under this category.
- **TYPE II** - The victim is a service provider, former employee, receiving services.
- **TYPE III** -- The offender has some type of relationship with the business or an employee. Most offenders in this type of violence are current or former employees, current or former friends of employees, relatives of employees, or current or former customers.
- **TYPE IV** – The victim of domestic violence. Domestic violence becomes a form of WPV when it occurs in the workplace.

¹² Risk assessments will be reviewed at least annually and after incidents or major incidents as required by Ontario and Canada Labour Code standards.

6 Roles and Responsibilities

Everyone in the workplace must be dedicated to preventing workplace violence, harassment, and discrimination. The following sets out the responsibility of all individuals to whom this Policy and Procedure applies:

Role	Responsibility
Employee	<ul style="list-style-type: none">• Ensure a harassment- and discrimination-free workplace• Always treat all employees and all visitors to ASP with respect• Report any incident of workplace harassment, violence or discrimination as noted herein• Participate in training related to workplace violence, harassment, and bullying prevention as required• Understand and comply with the expectations of this Policy and Program• Cooperate in an investigation and report all information truthfully
Managers/Supervisors	<ul style="list-style-type: none">• Be aware of ASP's Workplace Violence, Harassment, and Discrimination Policy, including procedures for reporting and investigating incidents• If a manager/supervisor receives a harassment or discrimination complaint or becomes aware that a person in the workplace may have acted contrary to this Policy, the manager/supervisor must promptly report the complaint or incident to Human Resources. Failure to report the complaint or incident to Human Resources may result in discipline• Ensure that employees are aware of and comply with this Policy.• Managers/supervisors are expected to uphold this Policy and ensure that the Program is followed.• Additional information regarding the Program and any processes are accessible in on-boarding presentation and a hard copy will be available on the Health and Safety Board or in the Human Resource Department• Follow SWP – for Termination and Disciplinary (see References 9.7)

Role	Responsibility
Human Resources	<ul style="list-style-type: none"> • Address with management any interim workplace modifications that may be necessary. Note, if the allegations are made against Human Resources, the supervisor can escalate the issue to the next appropriate level. • Ensure that all complaints are handled according to policy. Advising and assisting with the investigation and resolution of all complaints • Ensure that all aspects of the complaint are properly documented and maintained on a confidential basis. • “Internal to the workplace (e.g., supervisor, senior manager, human resources staff), work at another employer location (e.g., a corporate office), or external to the organization (such as a licensed private investigator, human resource professional, lawyer, or someone who holds some other professional designation) • Know the workplace harassment and reprisal provisions under Federal and provincial jurisdictions. • Aware of ASP Inc. Policy and program • Be diligent, objective, maintain confidentiality, be thorough and inform both parties in writing of the results of the investigation. • Follow SWP – for Termination and Disciplinary (see References 9.7)
Manager, Health and Safety	<ul style="list-style-type: none"> • Conduct assessment surveys to determine the risk associated with a specific job. • Advise the committee or a Health and safety representative, if any, or the results of the assessment, and provide a copy if the assessment is in writing. • Review the Workplace Violence, Harassment and Sexual harassment annually or as often as is necessary to ensure that the related policy under the OHS act and the related program under OHS Act continue to protect workers from workplace violence

Role	Responsibility
Senior Management	<ul style="list-style-type: none"> • Maintaining a work environment that is free of harassment and discrimination. • Maintain this Program and Policy and ensure that it is followed. • Ensure that an investigation into any incident or complaint of workplace harassment is conducted that is appropriate in the circumstances. • Provide employees with information and instruction that is appropriate to the contents of this Policy and Program • Review this policy and program in accordance with applicable law. • Post this policy and program in a visible place in the workplace where it will come to an employee’s attention (e.g., Health and Safety Board) • Provide appropriate training to all employees and implement preventative measures to minimize the risks of Workplace Violence and breaches of the Policy, including awareness sessions for managers and supervisors, orientation sessions for all new employees, and annual reviews of the Policy with employees
Role of Investigator(s)	<ul style="list-style-type: none"> • (CLC – Designated recipient) section 10(2) specifics to Policy Content) • Complete investigation within 90 days of the complaint • Ensure that all information obtained during the investigation, including interviews and documents, is kept confidential and shared only with those directly involved in the investigation process. • Provide regular updates to the complainant and respondent throughout the investigation process. If the investigation exceeds the 90-day timeline, provide monthly updates until the investigation is concluded. • Prepare a detailed investigation report that outlines the findings and, where applicable, makes recommendations for corrective actions or preventive measures to reduce future risks.
Policy Committee	<ul style="list-style-type: none"> • addresses issues that, because of their nature, cannot be effectively dealt with by individual workplace health and safety committees or representatives. • Policy committees strengthen the internal responsibility system by ensuring consistency across an employer's work sites

7 Corrective Action

7.1 Breach of Policy

In the event of a breach of this Policy, ASP will make reasonable efforts to remedy the effect(s) of the breach as appropriate, including through additional training or coaching.

7.2 Discipline

Failure to follow this Policy may also result in discipline in accordance with the Discipline Policy and, where applicable, the collective agreement, up to and including immediate termination of employment.

8 Complaint and Response Procedure

8.1 How to Bring Forward Concerns/Complaints under this policy

1. If possible, the concerned individual (complainant) is to ask the respondent (the person allegedly discriminating/bullying/ harassing/engaging in violence) to stop the offensive behaviour immediately, tell the respondent that the behaviour is unwelcome, and remind the respondent that the conduct is contrary to the Policy. This may resolve the matter.
2. If the complainant is not comfortable with confronting the respondent directly, or if the behaviour continues after confronting the respondent, the complainant should immediately report the harassment/bullying/discrimination/violence to management or Human Resources as soon as possible.
3. Employees can contact a Manager, Supervisor, Lead, Site Supervisor, Patrol Supervisor, or Human Resources Representative. If the employee's complaint is against their own supervisor or manager, then they may escalate their complaint directly to Human Resources.

This procedure applies even where employees believe that someone not employed by ASP is in violation of this policy.

8.2 Reporting Concerns and/or Complaints

A claim of a breach of this Policy may be made by an employee in writing, verbally to HR, electronically via our confidential email ASPHR@security-asp.com or by using the SafetyCulture QR code. Reports should include:

- Name and contact information of the complainant, name(s) of person alleged to have breached this, Policy; and name(s) of any witnesses to the incident
- Details of what happened with date(s), frequency, location(s), of the alleged incidents.
- Attach any supporting documents relevant to the complaint and list any documents a witness, another person or the person who is alleged to have engaged in harassment may have in their possession that is relevant to the complaint.

8.3 Management to Notify Human Resources

If a manager receives a complaint or becomes aware that a person in the workplace may have acted contrary to this Policy, the manager must promptly report the complaint or incident to Human Resources. Failure to report the complaint or incident to Human Resources may result in discipline, up to and including termination of employment. Human Resources will address with management any interim workplace modifications that may be necessary.

Note: If the allegations are against Human Resources, the manager can escalate the complaint as appropriate (i.e., report to the department head).

8.4 Witness Reporting

If an employee is a witness, that is they see or know about workplace harassment (including sexual harassment), bullying or violence, they can report it the same way. When a complaint is filed by a witness the person directly affected by the behavior (called the Principal Party) is the one who will decide how the complaint is handled. A witness should report person who was affected and, if possible, the person responsible.

8.5 Investigation

Any reported allegations of harassment, sexual harassment, violence, bullying, or reprisal will be investigated fairly, promptly¹³, thoroughly, and impartially by the Human Resources department or another appropriate party.

As applicable the investigation will be conducted pursuant to and in accordance with the terms and procedures set out in the collective agreement, CLC part 2 s. 20.1-10, OHS Act 32.0.06 / Alberta - 40(5)(b, c, d), 40(7-8) and 53 of the OHS Act.

1. The investigator will interview the complainant, the respondent, all potential witnesses (where possible) and any other individual whom the investigator deems relevant to the complaint.
2. If the investigation is extensive, monthly status updates will be provided starting after the second month of the investigation.
3. Upon completion of the investigation, the complainant and respondent will be informed of the findings
4. If the complaint is substantiated, persons found to have violated this Policy will be issued appropriate corrective action, including termination of employment for cause.
5. If the investigation reveals that an individual has brought a concern forward in bad faith, the individual will be subject to discipline, up to and including dismissal for cause.

¹³ Investigations carried out in accordance with the Canada Labour Code, Part 2 will carry the following timeline: acknowledgement within 7 days of the complaint, efforts to resolve the issues will begin within 45 days and completion of the investigation within 90 days.

8.6 Resolution Process

Initial Reporting:

Once a notice of occurrence is submitted (by the affected person or a witness), the company will acknowledge receipt of the complaint within 7 days.

Preliminary Review:

The complaint will be reviewed to determine if immediate action is required to protect anyone's safety. If necessary, temporary measures (e.g., adjustments to work duties or locations) will be taken.

Investigation:

An impartial investigator will be assigned to handle the case. The investigation will be conducted thoroughly and confidentially, with input from all parties involved. The investigator will gather evidence, interview the affected person (Principal Party), the respondent (Responding Party), witnesses, and anyone else relevant to the case.

Mediation (if applicable):

If both parties agree, mediation may be offered as a voluntary option to resolve the issue before the formal investigation begins or during the investigation. The goal is to reach a mutually acceptable solution. If mediation is successful, the issue will be resolved and documented. If not, the formal investigation will proceed.

Investigation Completion:

The investigation will be completed within 90 days, unless there are exceptional circumstances that require more time. In such cases, monthly updates will be provided to the affected party and the respondent.

Findings and Actions:

The investigator will prepare a report outlining the findings and any recommended actions. Both the affected person (Principal Party) and the respondent (Responding Party) will be informed of the investigation's outcome and any corrective measures that will be taken. Corrective actions could range from additional training or mediation to disciplinary actions, depending on the findings.

Follow-up:

After the resolution, follow-up actions will be taken to ensure that the issue has been resolved and to assess the effectiveness of any corrective measures.

9 General Provisions

9.1 Confidentiality

Confidentiality will be maintained throughout the investigation and resolution process, and identifying information will only be shared with individuals directly involved in the investigation, corrective action, or resolution of the complaint.

Information obtained about an incident or complaint of workplace harassment, sexual harassment, violence, or bullying including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purpose of investigating (e.g. disclosure to individuals involved in the concern, such as the complainant and respondent, and under some circumstances, witness) or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

It is the responsibility of all employees covered by this Policy to bring matters relating to violations of this Policy to the attention of Human Resources and management. All concerns/complaints made in good faith will be handled in as confidential a manner as possible.

All records of the investigation will be kept confidential. The investigation documents, including this report should not be disclosed unless necessary to investigate an incident or complaint of workplace harassment or violence, take corrective action¹⁴ or otherwise as required by law.

9.2 Retaliation/Reprisal

ASP expressly prohibits retaliation of any kind against anyone who makes a good faith report of discrimination, violence, bullying, or harassment (including sexual harassment). Retaliation against an employee for either reporting conduct contrary to this Policy or cooperating in a related investigation will not be tolerated. If it is determined that an employee has taken retaliatory action, the employee will be issued discipline in accordance with the Discipline Policy or, where applicable, the collective agreement, up to and including termination.

9.3 Communication and Training

Communication

This policy will be communicated by posting on the Health and Safety Bulletin board and at each office location.

¹⁴ See definitions in section 9 for specific regulatory reference.

Training

Employees will receive a general and site-specific orientation to the workplace violence, harassment, bullying, and sexual harassment prevention program at time of hire, and annually thereafter. Training will include instructions on how to report incidents, as well as details of the investigation process and employees' rights during the resolution of complaints. In addition, all employees will receive an annual review of the program's general and site-specific components. Any training developed, established, and provided will be done in consultation with and considering the recommendations of the workplace health and safety committee(s) and policy committee.

Refresher Training:

All employees will be provided with how to respond to virtual harassment, so everyone know their role. It will be recommended to all employees not to share personal social media information with clients, contractors and visitors.

Supervisor / Manager Training will be trained on their responsibilities including handling complaints, maintaining confidentiality, and ensuring compliance with this Policy.

9.4 Controls

ASP's active control measures include the following:

- Ensuring every security guard holds a valid provincial security licence.
- Maintaining a strict anti-harassment, violence, and bullying policy that fosters respect among all employees.
- Providing clear and effective communication channels for employees to report incidents of workplace violence, harassment, or bullying.
- Implementing ongoing employee training and awareness programs, which are essential to the prevention of workplace violence.
- Promoting a culture of acceptance of individual differences and taking proactive measures to prevent conflicts from escalating into harassment or violent situations.
- Encouraging all employees to immediately report any violent incidents or concerns.
- Formal investigation process that applies to every report submitted.

9.5 Reasons for Reviewing and Updating Risk Assessments

The workplace risk assessment will be reviewed and updated under the following circumstances:

- **Change in Workplace Conditions** Any significant changes in the workplace, such as physical modifications, organizational changes, or changes in employee roles that may affect the risks of harassment or violence.
- **Incident Occurrence** After any reported incident of workplace violence or harassment, to ensure that any new risks are identified and mitigated.
- **Identification of New Risks** If new risks are discovered that were not previously addressed in the initial workplace assessment.

9.6 Summary of Emergency Response Procedures

In the event of an imminent threat or serious incident involving workplace violence, harassment, or bullying, the following emergency procedures will be implemented:

- Immediate Action: If an immediate threat to employee safety is identified, the employer will take urgent steps to ensure the safety of all employees. This may include:
 - Relocating affected employees to a safe location.
 - Contacting law enforcement or emergency services as required.
- Incident Reporting: Employees must report any immediate danger to their supervisor, manager, or designated safety officer. Employees should follow established emergency communication protocols (e.g., using designated emergency numbers or alarm systems).
- First Aid and Medical Assistance:
If any employees are physically harmed, trained personnel will administer first aid, and medical assistance will be called if necessary.
- Notification of Senior Management and HR:
Senior management and HR will be notified immediately to activate the company's emergency response plan and coordinate further actions.
- Post-Incident Procedures:
After the immediate threat is contained, an incident investigation will begin, and additional safety measures will be implemented if necessary to prevent future occurrences.
Employees affected by the incident will be provided with access to support resources as appropriate.

9.7 Resources and References

Employees can contact a Health Professional through ASP's Employee Assistance Program called [LifeSpeak](#)

- User ID: ASP
- Password: life Speak

Additional Resources:

- [Occupational Health and Safety Act \(Ontario\)](#)
- [Canada Labour Code and Canada Occupational Health and Safety Regulations](#) – Part 2
- [Canada Workplace Harassment and Violence Prevention Regulations](#)
- [Criminal Code of Canada](#)
- [Provincial Human Rights Agencies](#)
- [Canadian Human Rights Act](#)
- [Workers' Compensation Boards in Canada](#)
- ASP Anti-Discrimination Policy

9.8 Policy Owner and Support

The ASP HR department is the authoritative source for defining and updating this Policy. The ASP HR team will review this policy yearly with the relevant stakeholders to determine whether modifications to this policy is necessary.

Any support requests for applying this standard should be directed to your manager. Requests for additional information should be directed to the ASP HR department at aspHR@security-asp.com.

9.9 Policy Evaluation

This workplace violence and harassment prevention program is evaluated annually by management and will be reviewed by the JHSC.

9.10 Record Keeping

ASP will keep records of all complaints made under this Policy and Procedure for a period of 10 years.

10 Definitions

Allegation – An allegation is an unproven claim or assertion that someone has done something wrong based on a reasonable belief that a violation of the Policy has occurred.

CLC – Canada Labour Code Part 2 definitions for Federal employees who may need to reference the jurisdiction they are governed by.

Complainant – The Alleged Victim that files a complaint or, in some cases, refers to the alleged victim of an alleged offence.

Corrective Action – According to ISO 45001, a global standard for the management of occupational health and safety, corrective action is defined as an action to eliminate the cause(s) of nonconformity or an incident and to prevent a recurrence.

Corrective Action (CLC) – <https://www.canada.ca/en/public-service-commission/services/oversight-activities/investigations/corrective-action.html>

Designated Recipient (CLC) – The person or work unit designated by the employer or organization to receive notices of occurrences.

Mediation – A confidential, voluntary process in which parties in a complaint may agree to participate, where a neutral third-party facilitator communicates with parties to effect an agreed-upon resolution.

Notice of Occurrence (CLC) – If you feel you have been a victim, or a witness, of workplace harassment and violence, you have the right to file a notice of occurrence with your employer. A witness may provide notice of an occurrence anonymously.

Occurrence (CLC) – Refers to any act or allegation of workplace harassment or violence that has been reported, regardless of whether it has been confirmed or proven.

Principal Party (CLC) – An employee or employer who is the victim of an occurrence of harassment and violence. “Principal party” refers to the person who is the object of an occurrence referred to as the “complainant.”

Respondent – the Alleged Perpetrator of the incident. The person against whom the complaint is made.

Responding Party (CLC) – The person identified in a notice of an occurrence as being responsible for the occurrence.

Reporting Methods – Designated avenues for reporting Workplace Violence, harassment and sexual harassment are through Safety Culture Software, Supervisors or Human Resources department.

Reprisal – Any harassment, intimidation, threats or negative action taken against a person (e.g., complainant, witness, investigator, or respondent) for making a report about an incident or complaint of alleged Harassment/Discrimination or Workplace Harassment or taken against persons for being involved in these complaint procedures. Reprisal is prohibited under the Policy.

10.1 What Is Not/May Not Be Harassment

Harassment does not include reasonable action taken supervisor or manager relating to the management and direction of Employees or the workplace, even if there are unpleasant consequences for the Employee. Examples may include:

- Direct supervision of employees, including setting performance goals and giving feedback
- Assigning work, providing instructions and changes in work assignments
- Scheduling/ approving or denying time off or requiring medical documents to support absences
- Performance evaluations
- Workplace inspections and requesting updates or reports from employees
- Disciplinary action

Harassment typically does not include differences of opinion or minor disagreements between Employees.

Domestic Violence/ Harassment: refer to CLC Part (24).

Ontario Human Rights Code (OHRC), Alberta Human Rights Act (AHR Act), and Canadian Human Rights Act (CHRA)

Bill 190 – Working for Workers Five Act, Schedule 4 Section (1), (2), (3)

<https://www.ontario.ca/laws/statute/s24019>