Policy Title	Non-Discrimination and Harassment Policy
Approved by	Dr. Chloe Atkins, Executive Director
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Purpose

Anti-harassment and anti-discrimination policies make it clear that harassment and discrimination will not be tolerated and set standards and expectations for behaviour.

The PROUD Project (PROUD) is committed to treating all present and prospective employees, volunteers, students, fellows with a working environment free of discrimination and harassment in accordance with the *Ontario Human Rights Code* to allow for equal opportunity and to promote full contribution and engagement.

Policy Objectives

The objectives of this Policy are to:

1. Ensure that employees and collaborators of PROUD are aware that harassment and discrimination are incompatible and unacceptable behaviours with the standards of our organization, in addition to being violations of the law
2. Make clear the types of behaviour that may be considered offensive and are prohibited by this Policy
3. To ensure that all documents and media are produced to be accessible and available to minimize potential or perceived discrimination.

PROUD is committed to a comprehensive strategy to address harassment and discrimination, including:

- Providing training and education to make sure everyone knows their rights and responsibilities
- Regularly monitoring organizational systems for barriers relating to the *Code* grounds;
- Providing an effective and fair complaints procedure

- Promoting appropriate standards of conduct at all times.

Scope

This Policy applies to:

- All persons acting on behalf of PROUD including those in leadership roles, employees, volunteers, students, or fellows
- All aspects of engagement with PROUD including but not limited to: recruitment, selection, working environment, compensation, and termination
- In person and virtual workplace activities and events such as meetings, business trips, or social activities.

Policy

PROUD will not tolerate nor should its employees, volunteers, students, or fellows tolerate or engage in any form of discrimination prohibited by *Ontario Human Rights Code*. If a claim of harassment or discrimination is proven, disciplinary measures will be undertaken, up to and including termination of the relationship.

PROUD will ensure that all documents, recordings and media produced are accessible and easily available to interested parties and are not considered or perceived as discriminatory to any individual or group.

This Policy prohibits discrimination or harassment based on the following grounds, and any combination of these grounds:

- Age, religion, sex (including pregnancy and breastfeeding), sexual orientation, gender identity or expression, family status, marital status, disability, race, ethnic origin, place of origin, or citizenship.

Procedure

Should an employee, student, volunteer or fellow experience behaviour which is discriminatory or harassment or has created a poisoned environment, the individual is encouraged to bring the complaint to the attention of the appropriate party at PROUD.

Complaints from staff, students or fellows can be made in writing to the Executive Director(s) outlining the nature of the discrimination and / or harassment experienced including specific behaviours or actions.

Complaints regarding the Executive Director(s) are to be made in writing to the Board of Directors.

Complaints about any documents, media or publications can be brought to the attention of the Executive Director(s).

The complaint should be made in writing, including details of:

- What happened: a description of the events or situation
- When it happened: dates and times of the events or incidents
- Where it happened
- Who saw it happen: the names of any witnesses, if any
- The person receiving the complaint will notify the person(s) complained against (the respondent(s)) of the complaint and provide the respondent(s) with a copy of the written complaint.

Steps:

1. The complaint will be acknowledged in a timely way, within 2 weeks of receipt of written complaint
2. Confidentiality will be maintained throughout the process
3. An investigator will be designated as appropriate to gather evidence including: interviewing complainant and the person(s) complained against and any witnesses.
4. Investigation will be conducted within a reasonable timeframe; within 1-2 months of the complaint
5. Use of conflict resolution approaches can be employed if appropriate
6. Documentation of the outcome of the investigation including remedial steps which could include education, mediation and/or disciplinary action will be completed
7. A written summary will be provided to the complainant and the person(s) to whom the complaint is against.

Definitions

Code:

Refers to the *Ontario Human Rights Code*.

Discrimination:

Any form of unequal treatment based on a *Code* ground, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral, but disadvantage certain groups of people. Discrimination may take obvious forms, or it may happen in very subtle ways. Even if there are many factors affecting a decision or action, if discrimination is one factor, that is a violation of this Policy.

Harassment:

A course of comments or actions that are known, or ought reasonably to be known, to be unwelcome. It can involve words or actions that are known or should be known to be offensive,

embarrassing, humiliating, demeaning or unwelcome, based on a ground of discrimination identified by this Policy. Harassment can occur based on any of the grounds of discrimination. Examples of harassment include:

- Epithets, remarks, jokes or innuendos related to a person's race, gender identity, gender expression, sex, disability, sexual orientation, creed, age, or any other grounds
- Posting or circulating offensive pictures, graffiti or materials, whether in print form or via e-mail or other electronic means
- Singling out a person for humiliating or demeaning "teasing" or jokes because they are a member of a *Code*-protected group
- Comments ridiculing a person because of characteristics that are related to a ground of discrimination. For example, this could include comments about a person's dress, speech or other practices that may be related to their sex, race, gender identity or creed
- If a person does not explicitly object to harassing behaviour, or appears to be going along with it, this does not mean that the behaviour is okay—the behaviour could still be considered harassment under the *Code*.

Sexual and gender-based harassment: sexual harassment is a form of harassment that can include:

- Gender-related comments about a person's physical characteristics or mannerisms
- Paternalism based on gender which a person feels undermines their self respect or position of responsibility
- Unwelcome physical contact, propositions of physical intimacy, and/or suggested or offensive remarks
- Gender-related verbal abuse, threats or taunting
- Leering or inappropriate staring
- Bragging about sexual prowess or questions or discussions about sexual activities
- Offensive jokes or comments of a sexual nature about an employee or client
- Rough and vulgar humour or language related to gender
- Display of sexually offensive pictures, graffiti or other materials including through electronic means.

Sexual Solicitation: this Policy prohibits sexual solicitation or advances by any person who is in a position to grant or deny a benefit to the recipient of the solicitation or advance. This includes those in leadership roles, as well as co-workers where one person can grant or deny a benefit to the other. Reprisals for rejecting such advances or solicitations are also not allowed.

Intersectionality:

People may experience discrimination and harassment based on the intersection of multiple grounds of discrimination (intersectionality). For example, a person who experiences harassment because she is a Muslim woman can file a complaint based on both sex and creed.

Poisoned environment:

A poisoned environment is created by comments or conduct (including comments or conduct that are condoned or allowed to continue when brought to the attention of management) that create a discriminatory work environment. The comments or conduct need not be directed at a specific person, and may be from any person, regardless of position or status. A single comment or action, if sufficiently serious, may create a poisoned environment.

References

1. Ontario Human Rights Commission
2. United Way Greater Toronto