



## A. POLICY

The Catholic Independent School Diocese of Prince George (“CISPG”) is committed to providing all individuals within our workplace a safe, healthy and respectful work environment.

Every person has a right to be in a school environment free from Bullying and Harassment and Discrimination, one in which the dignity of every individual is upheld. Bullying and Harassment and Discrimination is not acceptable and will not be tolerated. CISPG will take all reasonable steps to prevent, where possible, or otherwise minimize Bullying and Harassment and Discrimination and proactively maintain a respectful workplace.

Preventing Bullying and Harassment and Discrimination in the workplace is a shared responsibility. All Employees, contractors and any other persons working at, visiting, or otherwise attending our workplace are expected to treat others in a fair and respectful manner and should, in turn, expect to be treated in a fair and respectful manner.

## B. PURPOSE

Bullying and Harassment and Discrimination is a serious occupational health and safety issue that poses a potential risk to the physical and mental health and safety of Employees and others on our worksites. It can impair an individual’s concentration or ability to make decisions leading to safety hazards; it can cause distress or anxiety, physical illness, reduced work performance, and in extreme cases, suicidal thoughts or actions. It can negatively affect co-workers, family members and others. Detrimental effects of Bullying and Harassment and Discrimination in the workplace include reduced efficiency and productivity due to poor morale, increased stress and tensions between Employees, as well as high absenteeism and turnover rates. The Bullying and Harassment and Discrimination Policy (the “Policy”) outlines CISPG’s expectations with respect to workplace behaviour, CISPG’s commitment to ensuring a positive, productive, safe and comfortable work environment, and procedures for reporting, addressing and resolving Complaints of Bullying and Harassment and Discrimination.

## C. APPLICATION AND SCOPE

All Employees are required to comply with this Policy.

The scope of the workplace, for purposes of this Policy, is not limited to CISPG’s physical worksites. This Policy applies where the person adversely affected by an alleged incident of Bullying and Harassment or Discrimination is an Employee and where the alleged conduct occurred:

- while carrying out work duties;
- during employment-related activities such as CISPG-sponsored social events, business travel, conferences, and training; or
- through electronic means such as telephone communications, e-mail, the internet and social media if it has the potential to negatively impact the work environment.

## D. DEFINITIONS

**“Bullying and Harassment”** includes any inappropriate conduct or comment by a person towards an Employee that the person knew or reasonably ought to have known would cause that individual to feel humiliated or intimidated, but excludes any reasonable action taken by an employer or supervisor relating to the management and direction of Employees or the place of employment.

- Examples of reasonable management action include decisions related to job duties, the assignment of work, workloads, deadlines, transfers, reorganizations, work instructions and/or feedback, work evaluation, performance management and corrective or disciplinary action. Supervisors must ensure performance problems are identified and addressed in a constructive, objective way that does not humiliate or intimidate.

Examples of conduct or comments that might constitute Bullying and Harassment include, but are not limited to:

- verbal aggression or insults;
- physical or verbal threats;
- making aggressive or threatening gestures;
- calling someone derogatory names;
- harmful hazing or initiation practices;
- vandalizing or tampering with an individual’s personal belongings;
- sabotaging someone’s work;
- making personal attacks based on someone’s private life and/or personal traits; or
- spreading malicious gossip or rumours.

Not every unpleasant interaction or workplace conflict constitutes Bullying and Harassment. Examples of behaviours that may not be considered Bullying and Harassment, if undertaken in an appropriate manner, include expressing differences of opinion, offering constructive feedback, or making a legitimate Complaint about someone’s conduct through established procedures. It is expected that conflict about work-related matters will be resolved respectfully between the persons involved or with the assistance of a Principal, Superintendent or a mutually agreed to individual.

Interpersonal conflict about matters unrelated to work should not be discussed at the workplace.

**“Complainant”** an Employee who makes a Complaint under this Policy alleging that they have experienced or witnessed Bullying and Harassment or Discrimination.

**“Complaint”** a verbal or written statement alleging a violation of this Policy.

**“Discrimination”** includes unwelcome comments or conduct that treats an Employee differently, whether intended or not, because of their Indigenous identity, race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender identity or expression, age, or criminal conviction which is unrelated to the person’s employment, or any other ground set out in the British Columbia *Human Rights Code* (the “Code”), subject to any justified reason under the *Code*. Discrimination includes Sexual Harassment, as defined below.

**“Employee”** a person who is employed by CISPG, including permanent, temporary, and casual Employees, practicum students, and contractors who would be considered workers under the *Workers’ Compensation Act*.

**“Respondent”** any person or persons against whom an allegation of Bullying and Harassment or Discrimination has been made under this Policy.

**“Sexual Harassment”** means conduct or comments of a sexual nature that is unwelcome, and that detrimentally affects the work environment or leads to adverse job-related consequences. Sexual harassment includes, but is not limited to:

- unwanted touching;
- unwelcome sexual flirtations, advances or propositions;
- asking an individual to engage in a sexual activity as a condition of that person's employment;
- sexually suggestive, obscene or degrading comments or gestures;
- offensive jokes of a sexual nature;
- leering, whistling or staring;
- displaying or circulating pictures or other material of a sexual nature; or
- unwelcome questions or remarks about a person's sex, sex life, sexual orientation, gender identity or expression, appearance or clothing.

**“Support Person”** is a silent unbiased or neutral witness to the proceedings. The support person is not an advocate. The support person may be called upon in an appeal process. A respondent or complainant may have a support person present during an investigative interview.

## **E. RESPONSIBILITIES**

### **Employees are responsible for:**

- not engaging in Bullying and Harassment or Discrimination of Employees or any other individuals on CISPG worksites;
- applying and complying with this Policy;
- promptly reporting if Bullying and Harassment or Discrimination is observed or experienced; and,
- fully cooperating with investigations into potential Bullying and Harassment or Discrimination.

### **Management is responsible for:**

- proactively maintaining a workplace free from Bullying and Harassment and Discrimination;
- promptly responding to reported or suspected breaches of this Policy;
- training all Employees to recognize the potential for Bullying and Harassment and Discrimination, to respond appropriately, and to follow the procedures for reporting;
- providing a copy of the Policy to all Employees; and,
- communicating expectations to contractors, suppliers and others doing business on our office and school locations.

## **F. PROCEDURES**

### **Reporting Bullying and Harassment or Discrimination**

1. If a Pastor is named as a Respondent, the Complaint should be made to the Bishop utilizing The Roman Catholic Episcopal Corporation of Prince Rupert (RCEC) Respectful Workplace Policy located on the Diocese of Prince George website.
2. When an Employee experiences or witnesses Bullying and Harassment or Discrimination, they are encouraged to make it known to the person engaged in the conduct that the conduct is unwelcome, as long as the individual feels comfortable and safe in doing so.
3. If the conduct persists, if it is serious, or if the Employee is not comfortable in raising their concern with the person engaged in the conduct, then a Complaint of alleged Bullying and Harassment or Discrimination can be made as follows:
  - a. Complaints of Bullying and Harassment or Discrimination should be made to an Employee's Principal or immediate supervisor.
  - b. If the Principal or immediate supervisor is involved, either as the Complainant or Respondent, the Complaint should be made to the Superintendent.
  - c. If the Superintendent is involved, either as the Complainant or Respondent, the Complaint should be made to the President of CISPG Board of Directors.
  - d. If the Complaint involves an individual outside of the school (i.e. parent, council member or volunteer) as the Respondent, the Complaint should be made to the Principal.
4. If an Employee experiences or becomes aware of Bullying and Harassment or Discrimination directed toward another person but the Employee is unable to identify the person(s) responsible for the alleged conduct, they will report such incident(s) as outlined above. (3(a-d))
5. Complaints should be made as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated and addressed promptly.
6. Complaints of Bullying and Harassment or Discrimination can be reported verbally or in writing. When submitting a written Complaint, the Complainant is to use the Bullying and Harassment and Discrimination complaint form. When reporting verbally, the person to whom the incident is reported, along with the person reporting, will fill out the complaint form.
7. The Complaint should include as much information as possible, including the names of people involved, any witnesses, where the events occurred, when they occurred, and what behaviour and/or words led to the Complaint. Supporting documents such as e-mails, handwritten notes or photographs should be attached to the form. Physical evidence, such as vandalized personal belongings, can also be submitted.

#### **Informal Resolution**

8. At any time, the Complainant may speak or correspond directly with the Respondent to express their feelings about the situation and resolve the issue.
9. Depending on the nature and severity of the alleged conduct and subject to the consent of the Complainant, the Supervisor may first try to resolve the issue informally. If a resolution is reached informally, details of the Complaint and the resolution will be recorded in writing and will be signed by the persons involved. A copy will be placed in a confidential sealed envelope in the Employees' personnel file(s).
10. If informal resolution is not appropriate in the circumstances, if the Complainant does not agree to attempt informal resolution, or if informal resolution cannot be reached, then CISPG will determine if it is appropriate to investigate the Complaint and, if so, conduct or arrange the investigation.

#### **Investigation Process**

11. Investigations under this Policy will generally be conducted by Principal or Superintendent or their designate. In complex or sensitive situations, an external investigator may be retained.
12. In the event an alleged target of Bullying and Harassment or Discrimination does not wish to proceed with a Complaint, CISPG may still conduct an investigation if deemed necessary to ensure the health and safety of all persons at the workplace and to comply with its legal obligations.
13. CISPG shall notify the Respondent of the existence of the Complaint and provide notice of investigation.
14. Investigations will be as thorough as necessary given the circumstances and will:
  - a. be fair and impartial, providing equal treatment for both the Complainant and Respondent in evaluating the allegations;
  - b. be sensitive to the interests of all parties, and maintain confidentiality;
  - c. focus on finding facts and evidence, which should include interviews with the Complainant, Respondent, and any witnesses, and the collection of any other evidence that may be relevant to the investigation; and,
  - d. incorporate, where necessary, any need or request from the Complainant or Respondent for assistance during the investigation process.
15. The investigation shall be conducted expeditiously having regard to the circumstances and the need to ensure a fair process.
16. At their choice, the Complainant and the Respondent may be accompanied by a support person at all meetings under this Policy. The support person is a silent unbiased or neutral witness to the proceedings. The support person is not an advocate. The support person may be called upon in an appeal process.

#### **Follow-up**

17. Following the conclusion of the Investigation, the Complainant and Respondent will be advised whether or not the Complaint was substantiated.
18. If the investigator's report determines that the alleged conduct does not constitute Bullying and Harassment or Discrimination, CISPG may take other steps to address the Complaint. For example, if the investigator's report discloses other kinds of misconduct, CISPG may address this under another CISPG policy or process.
19. If the investigator's report determines that Bullying and Harassment or Discrimination occurred, the conduct will be addressed in accordance with the "Remedies and Corrective Action" section below. Certain behaviors, in addition to constituting Bullying and Harassment or Discrimination, may be a violation of the *Criminal Code*. CISPG will report all criminal activity including physical threats, assaults, and incidents of criminal harassment, such as stalking, to the police.
20. Following an investigation, the supervisor will review any relevant workplace procedures and determine whether any revisions are necessary to prevent future Bullying and Harassment or Discrimination incidents in the workplace.
21. In appropriate circumstances, individuals may be referred to the Employee and Family Assistance program or encouraged to seek appropriate medical or other support.

#### **Remedies and Corrective Action**

22. All conduct that is determined to be a breach of this Policy will be addressed by attempting to remedy the harm that has been caused and prevent further harm.
23. Any Employee who is found to have engaged in conduct prohibited by this Policy may be subject to corrective action or discipline up to and including termination of employment.

24. Any Employee who makes malicious, false or reckless allegations of Bullying and Harassment or Discrimination may be subject to disciplinary action up to and including termination of employment.
25. Any retaliation against any Complainant, witness, or other party involved in a Complaint or investigation shall be considered an independent violation of the Policy may be result in disciplinary action up to and including termination of employment.
26. Appropriate action will be taken against persons who are not Employees of CISPG who engage in conduct prohibited by this Policy.
27. Corrective actions will be taken within a reasonable timeframe.
28. These resolution procedures do not negate a Complainant's rights to file a WorkSafe BC claim or a complaint of discrimination to the BC Human Rights Tribunal.

### **Confidentiality**

29. Confidentiality of all persons and information involved in a Complaint is expected. CISPG will only release information as necessary to conduct a proper investigation, to take disciplinary measures, or where required by law.

### **G. DOCUMENTATION AND RECORD KEEPING**

30. Individuals experiencing or observing incidents of Bullying and Harassment and Discrimination are expected to keep written accounts to submit with the Complaint.
31. CISPG will maintain confidential written records of all investigations including the findings. A copy will be placed in a confidential sealed envelope in the Employees' personnel file(s) at the CISPG office.

### **H. TRAINING**

CISPG shall be responsible for developing and implementing an ongoing Bullying and Harassment and Discrimination awareness program for all Employees. This will include:

- Legal duties under the *Workers Compensation Act*
- Recognizing the potential for Bullying and Harassment and Discrimination
- The legal duties of employers, Employees, and supervisors for preventing and responding to Bullying and Harassment and Discrimination
- Workplace reporting procedures
- How incidents or Complaints are dealt with, including investigations
- What Employees can do to stop Bullying and Harassment and Discrimination

This awareness program will be provided to all new hires; and an annual review will be scheduled for all Employees with an annual training sign-off. Acknowledgement sign-offs will be retained in Employee's personnel file.

### **I. ANNUAL REVIEW**

This Policy will be reviewed by the CISPG Board of Directors annually and updated on the CISPG website as required.

### **J. REFERENCES**

BC Human Rights Code: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/00\\_96210\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/00_96210_01)  
 BC Human Rights Tribunal: <https://www.bchrt.bc.ca/>  
 Workers Compensation Act: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/19001\\_00](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/19001_00)  
 WorkSafeBC's Occupational Health and Safety Regulation: <https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation>  
 WorkSafe BC Health & Safety – Bullying and Harassment: <https://www.worksafebc.com/en/health-safety/hazards-exposures/bullying-harassment#:~:text=Employers%20must%20implement%20procedures%20for,or%20minimized%20in%20the%20future.>  
 Policy and Procedures 310 – CISPG Policy Manual, School Administration - Major Complaints <http://cispg.ca/wp-content/uploads/2023/10/310-Policy-Procedures-Major-Complaints.pdf>  
 Roman Catholic Episcopal Corporation of Prince Rupert (RCEC) Respectful Workplace Policy [www.pgdiocese.bc.ca/wp-content/uploads/2022/02/Respectful-Workplace-Policy-v1.1.pdf](http://www.pgdiocese.bc.ca/wp-content/uploads/2022/02/Respectful-Workplace-Policy-v1.1.pdf)  
 Acknowledgement Sign Off form <https://cispg.ca/wp-content/uploads/2024/07/476-Acknowledgement-form-Bullying-and-Harassment-and-Discrimination.pdf>  
 Employee Assistance Program <https://www.cisva.bc.ca/files/benefits/EAP%20Brochure.pdf>

<p><b>References:</b></p> <ul style="list-style-type: none"> <li>• Form Bullying and Harassment or Discrimination</li> <li>• CISPG Workplace Bullying and Harassment or Discrimination PPT</li> <li>• CISPG Bullying and Harassment or Discrimination Acknowledgement Form</li> </ul>	<p><b>Date:</b> August 2023</p> <p><b>Revisions:</b> June 2024, Ratified by BOD June 18, 2024</p>
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