

Cooperation Canada Prevention of Harassment, Discrimination and Violence Policy and Program

Policy approved: March 20, 2023

Policy revised: as needed and, at least, annually

1. INTRODUCTION

As a diverse and inclusive organization, Cooperation Canada strives to create and maintain a workplace that is free from harassment, discrimination and violence. As an NGO working in the international co-operation sector, Cooperation Canada is particularly aware of the impact of inequity and discrimination and is committed to providing a work environment in which all individuals are valued and treated with dignity and respect. As an employer, Cooperation Canada recognizes that its employees are entitled to a respectful workplace as required under the Ontario Occupational Health and Safety Act, the Ontario Human Rights Code, Ontario Employment Standards Act and the Criminal Code of Canada. Cooperation Canada will not tolerate workplace harassment, including sexual harassment, discrimination or violence (hereafter called “harassment or violence”) in any of its activities by any of its employees. This policy works in concert with the Personal Code of Conduct for Employees, Volunteers and Consultants, the Staff Diversity Policy, the Whistleblower and Grievance Policy and with the Cooperation Canada/CUPE Local 3371 Collective Agreement. This policy is also intended to support the creation and maintenance of a positive and safe working environment free from harassment, discrimination and violence. The policy will help ensure all staff and volunteers understand that harassment, discrimination and violence are not acceptable, regardless of seniority and position, and will be subject to appropriate procedures. The policy will also ensure all staff and volunteers understand their rights and responsibilities towards preventing and addressing harassment, discrimination and violence.

2. APPLICATION

This policy applies to Cooperation Canada managers, employees, volunteers, interns, contractors, and board members and is directly linked to Cooperation Canada’s Personal Code of Conduct for Employees, Volunteers and Consultants, a document that also applies to the individuals noted above. This policy applies to the Cooperation Canada office and to work-related events, including events organized by Cooperation Canada in other locations.

3. DEFINITIONS

3.1 Respectful Behaviour

Respectful behaviour is the cornerstone of an open, inclusive, safe and effective workplace. Respectful behaviour, in general, is characterized by showing respect, fairness and consideration to others, actively listening and thoughtfully responding to others. It includes ensuring that the environment is free from harassment or violence on any basis. It also involves being invested in prioritizing how others are treated, challenging ideas and not people, sharing expectations and being open to the training and learning that supports these principles, and to escalating concerns appropriately if they are not addressed.

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3.2 Workplace harassment

Workplace harassment means

- (a) engaging in a course of vexatious comment or conduct against a person that is known or ought reasonably to be known to be unwelcome, including through information and communication technologies (ICT). Cooperation Canada managers, employees, board members, guests, visitors, contractors and member organization representatives are prohibited from harassing any other person in the workplace. The conduct typically happens more than once. It could occur over a relatively short period of time (for example, during the course of one day) or over a longer period of time (weeks, months or years). However, there may be situations where the conduct happens only once.

Workplace harassment may include but is not limited to:

- offensive or intimidating comments or jokes
- actions that embarrass, humiliate or demean
- behaviour that intimidates or isolates
- bullying or aggressive behaviour
- displaying or circulating offensive pictures or materials
- isolating or making fun of a person
- psychological harassment (comments, gestures or actions that harm a person's dignity or psychological integrity and harm the working environment)
- personal harassment (any behaviour that while not related to a protected ground, results in an intimidating demeaning or hostile environment)
- workplace sexual harassment (see below)

A reasonable action taken by an employer or manager relating to the management and supervision of individuals is not workplace harassment.

3.3 Workplace sexual harassment

Workplace sexual harassment means

- (a) engaging in a course of vexatious comment or conduct against a person because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or
- (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 other individual and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.
- (c) The conduct typically happens more than once. It could occur over a relatively short period of time (for example, during the course of one day) or over a longer period of time (weeks, months or years). However, there may be situations where the conduct happens only once.

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Workplace sexual harassment may include but is not limited to:

- unnecessary physical contact, including unwanted touching,
- derogatory language and/or comments including sex-specific derogatory names
- gender-related comments about a person's physical characteristics or mannerisms
- comments relating to a person's perceived non-conformity with a sex-role stereotype
- displaying or circulating pornography, sexual pictures or other sexual images (including online)
- sexual jokes, including circulating written sexual jokes (e.g. by e-mail)
- spreading sexual rumours (including online)
- suggestive or offensive remarks or innuendo about managers of a specific gender
- propositions of physical intimacy
- gender-related verbal abuse, threats or taunting
- bragging about sexual prowess
- demanding dates or sexual favours
- questions or discussions about sexual activities
- requiring an employee to dress in a sexualized or gender-specific way
- threats to penalize or otherwise punish a person who refuses to comply with sexual advances

continuum of inappropriate and/or unacceptable behaviours can occur at the workplace. This can range from offensive remarks to violence. Workplace harassment may escalate over time.

Virtual Harassment and Remote Work Contexts

Workplace harassment may also occur in virtual or remote environments, including but not limited to emails, video calls, chat messages, and social media interactions. In line with the Ontario Occupational Health and Safety Act, harassment and sexual harassment occurring in virtual spaces or during remote work—whether synchronous or asynchronous—are covered by this policy and will be addressed with the same seriousness as in-person incidents.

Virtual harassment may include but is not limited to:

- sending repeated or inappropriate messages through digital platforms
- displaying offensive materials via video call backgrounds or screen sharing
- making unwanted comments during virtual meetings
- using communication technologies to isolate, intimidate, or surveil others

Where harassment, including sexual harassment, in the workplace involves threats, attempts or acts of physical force that causes or could cause physical injury, it would be considered to be workplace violence under the Ontario Occupational Health and Safety Act (OHSA).

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3.4 Discrimination

The *Ontario Human Rights Code* states that every person has a right to equal treatment with respect to employment without discrimination. The right to “equal treatment with respect to employment” covers every aspect of the workplace environment and employment relationship, including job applications, recruitment, training, transfers, promotions, apprenticeship terms, dismissal and layoffs. It also covers rate of pay, overtime, hours of work, holidays, benefits, shift work, discipline and performance evaluations.

The Ontario Human Rights Code prohibits discrimination on the basis of:

- Age
- Creed (religion)
- Sex (including pregnancy and breastfeeding)
- Sexual orientation
- Gender identity
- Gender expression
- Family status (such as being in a parent-child relationship or “type” of relationship)
- Marital status (including married, single, widowed, divorced, separated or living in a conjugal relationship outside of marriage, whether in a same-sex or opposite-sex relationship)
- Disability (including mental, physical, development and learning disabilities, addictions and environmental sensitivities)
- Race
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Colour
- Record of offences (an offense in respect of any provincial enactment, or for an offence for which a pardon has been received)
- Association or relationship with a person identified by one of the above grounds or perception that one of the above grounds applies.

3.5 Workplace violence

Workplace violence means

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

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Workplace violence against an individual may be a one-time occurrence or involve repeated behaviours over time and may include but is not limited to:

- verbally threatening to attack someone
- hitting, kicking, biting and shoving that causes or could cause physical injury
- an attempt to exercise physical force against an individual, such as an attempt to hit or shove
- a statement or behaviour which is reasonable for an individual to interpret as a threat of violence
- leaving a person a threatening note or threatening an act of violence against a person
- shaking a fist in someone's face
- throwing an object at someone
- sexual violence against someone

A person does not need to have the capacity to understand that their behaviour could cause physical injury to another to be workplace violence under the OHSA. It is important to identify and manage inappropriate and/or unacceptable behaviours early to minimize the potential for these behaviours to lead to workplace violence.

3.6 Domestic violence

Domestic violence is a pattern of behaviour used by one individual to gain power and control over another with whom they have or have had an intimate relationship. Domestic violence that occurs in the workplace is considered to be workplace violence.

Examples of domestic violence may include but is not limited to:

- physical violence
- stalking
- emotional and psychological intimidation and verbal abuse

4. COOPERATION CANADA'S COMMITMENT

Cooperation Canada is committed to a workplace free of workplace harassment, workplace sexual harassment, discrimination, workplace violence and domestic violence. Cooperation Canada managers, employees, volunteers, interns, contractors, and board members share responsibility for this commitment and for contributing to a respectful work environment.

Workplace harassment, workplace sexual harassment, discrimination, workplace violence and domestic violence are prohibited.

5. RISK ASSESSMENT

Cooperation Canada will continually assess potential workplace violence risks arising from the nature of the workplace, type and conditions of the work, will inform employees about the results of the risk

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assessment and will use it to inform the ongoing development of the workplace violence prevention program. The assessment will take circumstances specific to the workplace and common to similar workplaces into account. Risk assessments shall include consideration of remote and virtual work environments, with attention to the specific risks posed by virtual information and communication technologies (ICT) and the potential for online harassment or violence. The risks will be reassessed as often as is necessary to ensure the related policy and program continue to protect employees.

Measures and procedures for managing risks may include:

- safe work procedures;
- design or physical layout of the workplace such as doors with clear windows, adequate lighting;
- emergency procedures that would be relevant to violent or potentially violent incidents, such as designated safe locations or lockdown procedures;
- procedures for informing employees about a person with a history of violence, as appropriate in the circumstances, or potentially violent situations;
- employee training on the measures, procedures and processes set out in the respect in the workplace policy and program;
- employee training on managing a person who may become aggressive or violent.

6. SUMMONING IMMEDIATE ASSISTANCE

Cooperation Canada will ensure the development of appropriate measures and procedures for summoning immediate assistance when workplace violence occurs or is likely to occur.

Measures and procedures may include:

- the use of equipment to summon assistance such as fixed or personal alarms, locator or tracking systems, access to phones, cell phones, etc.;
- positioning individuals within calling distance of each other;
- posting emergency telephone numbers around the workplace.

7. REPORTING PROCEDURES

7.1 Immediate response

When a Cooperation Canada staff member or volunteer experiences or becomes aware of harassment or violence, they must report it immediately to the Chief Executive Officer or Chief Operations Officer, as applicable, who will take immediate action. Reports may pertain to incidents that occur in person, during remote work, or in virtual environments such as video calls, emails, or digital messaging platforms. If harassment or violence is suspected, an investigation may be initiated regardless of whether a written complaint is received. Cooperation Canada upholds the values of a survivor-centred

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approach and, where possible, will make employee benefits and support systems available to complainants, respondents, and witnesses.

7.2 Complaint forms

Complaints of harassment or violence shall be made verbally or in writing using the designated [complaint form](#) to the following individuals as soon as possible and no later than one year from the incident or from the most recent incident where behaviour has been ongoing:

- i. Where the complainant or the respondent is an **employee, contractor, guest or visitor**; a complaint will be made to the **Chief Executive Officer or Chief Operations Officer, as applicable**.
- ii. Where the complainant or respondent is the **Chief Operations Officer**, a complaint will be made to the **Chief Executive Officer**.
- iii. Where the complainant or respondent is the **Chief Executive Officer**, a complaint will be made to **one or both Co-Chairs of the Board of Directors**.

7.3 Confidentiality

The complaint process and any related documentation shall be kept strictly confidential and only those on a “need to know” basis shall be advised of a complaint.

7.4 Interim measures

In circumstances where the behaviour of the respondent is deemed by the person receiving the complaint to put the complainant(s) at risk for their health and safety, the Chief Executive Officer or Chief Operations Officer may decide to put in place any appropriate interim measure to ensure the health and safety of anyone involved in the alleged complaint(s).

8. INVESTIGATION

8.1 Commitment to investigate

Once a report or complaint is received, Cooperation Canada shall conduct a preliminary assessment of the complaint received and ensure that an investigation appropriate to the circumstances is conducted immediately. No one with a conflict of interest shall be involved in receiving the complaint, investigating the complaint or the disposition of the complaint. Any person with such a conflict will declare it immediately. Cooperation Canada will provide an opportunity for input from the complainant during the preliminary assessment and inform them regarding decisions made about proceeding with an investigation.

8.2 Who will investigate

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The Chief Executive Officer or Chief Operations Officer, as applicable, will determine who will conduct the investigation into the incident or complaint based on who the complainant and the respondent are. If the complaint involves a senior leader or board member, the investigation may be referred to an external investigator to conduct an impartial investigation. Whether the investigator is internal or external to the organization, the investigation must be objective. The person conducting the investigation must not be directly involved in the incident or complaint and must not be under the direct control of the respondent. The investigator should have the requisite training, experience and knowledge of how to conduct an investigation appropriate to the circumstances.

8.3 Timing of the investigation

The investigation must be completed in a timely manner and no later than **ninety (90) days** after the complaint was received unless there are extenuating circumstance (i.e. illness, complex investigation) warranting a longer investigation timeframe. In the event of extenuating circumstances and the need for a longer investigation timeframe, the investigator will communicate the new estimated timeline for completion to the Chief Executive Officer or Chief Operations Officer, as applicable, and to the Complainant and Respondent.

8.4 Investigation process

The person conducting the investigation, whether internal or external, will, at a minimum, uphold the following:

- i. The investigator must ensure the investigation is kept confidential and identifying information is not disclosed, unless absolutely necessary to conduct the investigation. The investigator should remind the parties of this confidentiality obligation at the beginning of the investigation and thereafter as required.
- ii. The investigator must thoroughly interview the individual who allegedly experienced the harassment or violence ("the complainant") and the person who is the subject of the complaint ("the respondent") if this individual is an employee, using a trauma-informed approach. If the respondent is not an employee, the investigator should make reasonable efforts to interview the respondent.
- iii. The respondent must be given the opportunity to respond to the specific allegations raised by the complainant. In some circumstances, the complainant should be given a reasonable opportunity to respond to the respondent's reply and to offer additional information or clarifications.
- iv. The investigator must interview any relevant witnesses employed by the employer who may be identified by either the complainant or the respondent or by the investigator as necessary to conduct a thorough investigation. The investigator must make reasonable efforts to interview any relevant witnesses who are not employed by the employer if there are any identified.
- v. The investigator must collect and review any relevant documents, evidence such as photographs and copies of emails or text messages.

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- vi. The investigator must take appropriate notes and statements during interviews with the complainant, the respondent and any witnesses.
- vii. The investigator must prepare a written report for management (Chief Executive Officer, Chief Operations Officer or Board co-chairs, as appropriate) summarizing the steps taken during the investigation, the complaint, the allegations of the individual who allegedly experienced the workplace harassment, the response from the alleged harasser, the evidence of any witnesses, and the evidence gathered. The report must align with the scope of the investigation and may set out findings of fact, conclude whether harassment or violence occurred, and whether a violation of this policy was found and make recommendations, if requested.

8.5 Confidentiality

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of harassment or violence including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect individuals, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

While the investigation is on-going, the complainant and respondent and any witnesses should not discuss the incident or complaint or the investigation with each other or other individuals unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

All **records** of the investigation shall be kept strictly confidential.

9. RESULTS/OUTCOMES

9.1 Results of the investigation

Within **ten (10) days** of the investigation being completed, the complainant and the respondent if he, she or they is/are an employee, will be informed in writing of the results of the investigation and any corrective action that has been taken or that will be taken by the employer to address harassment or violence. The results of the investigation are not the same as the investigation report. The results are a summary of the findings of the investigation. The amount of information provided about the corrective action will depend on the circumstances but must indicate what steps the employer has taken or will take to prevent a similar incident if harassment or violence was found.

9.2 Report

The Investigator shall prepare a written report that shall be given to the Chief Executive Officer or Chief Operations Officer, as applicable.

9.3 Disposition

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Where the complaint is substantiated in whole or in part, the Chief Executive Officer or Chief Operations Officer, as applicable, shall determine the disposition of the complaint and any corrective action that will be taken. The disposition may include corrective measures, discipline, or censure. The disposition of the complaint will be decided in consultation with legal counsel and shall be confidential. However, the complainant and the respondent shall be made aware of the nature of the disposition of the complaint (as per 9.1).

9.4 Mediation

Where the complaint is not substantiated in whole the issue will be deemed resolved. Mediation may be offered to the parties of the complaint, as appropriate. There shall be no penalty or reprisal for a complaint made in good faith where the investigation does not substantiate the allegation(s).

10. RECORD KEEPING

The Chief Executive Officer or Chief Operations Officer, as applicable, shall determine how to ensure the confidentiality of the records and shall ensure that the following records are kept:

1. a copy of the complaint or details about the incident;
2. a record of the investigation including notes;
3. a copy of the investigation report (if any);
4. a summary of the results of the investigation that was provided to the complainant and respondent, if an employee of the employer;
5. a copy of any corrective action taken to address the complaint or incident of harassment or violence.

All records of the investigation shall be kept confidential. The investigation documents, including the investigation report, should not be disclosed unless necessary to investigate a new incident or complaint of harassment or violence, take corrective action or otherwise as required by law.

11. REVIEW

This policy and program shall be reviewed as needed and, at least, annually.

Last reviewed: March 31, 2026



Kate Higgins (Jul 13, 2026 19:09:17 EDT)

Kate Higgins, CEO

March 31, 2026

Date Approved

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Harassment or violence complaint form

Employees can make use of the anonymous [complaint form](#). They can also submit a complaint with the following form. If more information is required from the electronic complaint form, additional information may be requested via this form.

Whether the individual uses the complaint form or not, Cooperation Canada is obligated to ensure an investigation appropriate in the circumstances is conducted into an incident of harassment or violence.

Name and contact information of individual who is filing the complaint (your name):

Name and contact information of individual who has allegedly experienced harassment or violence if not the person who is filing the complaint:

Name of alleged harasser(s) and contact information, if available:

Details of the complaint of harassment or violence:

Please describe in as much detail as possible the harassment or violence incident(s), including: (a) the names of the parties involved; (b) any witnesses to the incident(s); (c) the location, date and time of the incident(s); (d) details about the incident(s) (behaviour and/or words used); (e) any additional details. (Attach additional pages if required).

Relevant Documents/Evidence

Attach any supporting documents, such as emails, handwritten notes, or photographs. Physical evidence, such as vandalized personal belongings, can also be submitted. If you are not able to attach documents and they are relevant to your complaint, please list the documents below. If someone else has relevant documents, please note that below.

Signature:

Date:

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Harassment or violence Investigation Template

This template may be used for guidance in investigating harassment or violence incidents or complaints. It may not be appropriate for complex workplace investigations. The person conducting the investigation must not have been involved in the incident or complaint of harassment or violence and must not be under the direct control of the alleged harasser.

Name of investigator:

Date of investigation:

A. Background Information: Who are the people involved? Are they workers as defined by OHSA? Who reported the incident(s) and when? (Attach more pages if necessary)

1. Name and position of person who **reported** harassment or violence (the initial complainant):
2. If not the same person as above, name and position of person who allegedly **experienced** harassment or violence (the actual complainant):
3. Date complaint/concern raised and how:
4. Names and positions of other individuals (complaining or possibly exposed to harassment or violence):
5. Name and position of the alleged harasser (the respondent). If not a manager or employee – provide details:

B. Investigation Plan: Plan and conduct the investigation (Attach more pages if necessary):

1. Obtain the complainant's concerns of harassment or violence in writing, if possible. Assistance should be provided in completing the form where necessary. Where the initial complainant is not the actual complainant ensure that the initial complainant understands the need for confidentiality and the limits of information that will be shared with them as the investigation moves forward to maintain confidentiality.
2. An investigator needs to interview the complainant and the respondent (if a manager or employee of Cooperation Canada). If the respondent is not a manager or employee of Cooperation Canada, the investigator should make all reasonable efforts to interview the individual.
3. Make a list of possible relevant witnesses. The complainant and the respondent should be asked for names of any relevant witnesses.
4. Interview relevant witnesses while maintaining confidentiality. Ask specific questions about what they have observed, are aware of or have personally experienced. If the witnesses are not managers or employees of Cooperation Canada, the investigator should make all reasonable efforts to interview those witnesses.

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5. Collect and review relevant documents from the complainant, the respondent, witnesses and the employer.

6. Use good interview practice and take detailed notes.

7. Keep the investigation strictly confidential. Instruct the complainant, the respondent and witnesses not to talk to anyone about the investigation unless that person is an advisor such as a lawyer or counsellor providing legal advice or psychological support during the investigation.

C. Complainant concerns/harassment or violence allegations (Attach more pages if necessary): When did the incident(s) occur? Confirm date of first incident and any subsequent behaviours or conduct. Note that recalling events of harassment or violence can be stressful for the complainant.

Date of first incident:

Date of last incident:

Date of other incident(s):

D. Respondent(s) Response (Attach more pages if necessary): The respondent(s) will need details of the allegation of harassment to be able to respond.

E. Interview Relevant Witnesses (Attach more pages if necessary): List witnesses. Interview relevant witnesses and make notes.

F. Collected documentation (Attach more pages if necessary): List the documents collected for the investigation and how or from whom they were obtained.

G. Investigation Result(s) (Attach more pages if necessary): The investigator's summary report should set out who was interviewed, what evidence was obtained and an analysis of the evidence to determine whether workplace harassment occurred.

Summary of key evidence:

Next Steps:

Report provided to:

Name:

Position:

Date:

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Final Audit Report

2026-07-13

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