

ETHNOS CANADA

POLICY ON WORKPLACE VIOLENCE AND HARASSMENT

Statement of Policy

Ethnos Canada is committed to providing a workplace that fosters respect and dignity for each person, consistent with our relationship as believers to God through Jesus Christ and the principles for Christian behaviour clearly presented in the Bible. In keeping with that goal, violence or harassment¹ of any kind and at any level in the workplace will not be tolerated.

Ethnos Canada is committed to all reasonable measures to prevent incidents of workplace violence or harassment and to act promptly, fairly, and with discretion on any report of such activity. Where an allegation of violence or harassment is substantiated, the offender will be sanctioned in accordance with this policy regardless of his or her position within the organization.

This policy relates to adults. Situations involving inappropriate behaviour toward persons below 18 years of age will be handled in accordance with the Ethnos Canada Child Protection Policy and Procedures manual.

This policy pertains to incidents on the Durham campus, as well as at other locations where Ethnos Canada ministry-related activities may take place.² Ministry locations outside of Canada may also be governed by other violence and/or harassment policies.

A workplace violence and harassment prevention and response program has been developed to implement this policy, it includes,

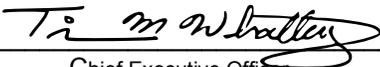
- measures and procedures to protect workers³ from workplace violence and harassment, including the educating of employees with respect to this issue,
- a means of summoning immediate assistance when workplace violence or harassment occurs,
- a process for workers to report incidents or raise concerns to the ELT, and
- details of how incidents of workplace violence or harassment will be investigated and dealt with.

The ELT will ensure that this policy and the supporting program are implemented and maintained. All workers and persons in position of leadership will receive appropriate information and instruction on the contents of the policy and program.

Department leaders will adhere to this policy and the supporting program. They will be responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Every worker must work in compliance with this policy and the supporting program. All workers are encouraged to raise any concerns about workplace violence and harassment and to report any incidents or threats.

The ELT pledges to investigate and deal with all incidents and complaints of workplace violence or harassment in a fair and timely manner, respecting the privacy of all concerned as much as possible.

Signed:  Date: **November 20, 2019**
Chief Executive Officer

¹ This policy applies to all forms of harassment, including sexual harassment by men towards women, by women towards men, between men, and between women. Any person who has been harassed (or is aware of harassment) by anyone covered by this policy may initiate a complaint under this policy.

² Ethnos Canada recognizes that its workers may be harassed in the course of their work by persons outside the reach of this policy. Ethnos Canada will seek to provide support and assistance to such workers in keeping with the relevant circumstances.

³ All Ethnos Canada employees, volunteers, and Emanate students engaged in an organized work program will hereafter be referred to collectively in this document as "workers."

PROGRAM FOR THE PREVENTION OF WORKPLACE VIOLENCE AND HARASSMENT AND INCIDENT RESPONSE MEASURES

Ethnos Canada

I. Definitions and Examples

General Definition of Workplace Violence

According to the Ontario Occupational Health and Safety Act, “workplace violence” means,

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

Examples of workplace violence include, but are not limited to:

- Threatening behavior such as shaking fists, destroying property or throwing objects;
- Verbal or written threats that express an intent to inflict harm;
- Physical acts/attacks such as hitting, shoving, pushing, kicking, sexual assault
- Disruptive behavior which is inappropriate to the work environment (e.g. yelling, swearing);

General Definition of Harassment

Harassment is any behaviour that demeans, humiliates, or embarrasses a person, and that a reasonable person should have known would be unwelcome. It includes actions (e.g. touching, pushing), comments (e.g. jokes, name-calling), or displays (e.g. posters, cartoons). It may be a single incident or continue over time. The *Canadian Human Rights Act* protects employees and people receiving goods and services from harassment that is related to their race, national or ethnic origin, colour, religion, age, sex, marital status, family status, disability, pardoned conviction, or sexual orientation.

Examples of harassing behaviour include, but are not limited to:

- Unwelcome remarks, slurs, jokes, taunts, or suggestions about a person's body, clothing, race, national or ethnic origin, colour, religion, age, sex, marital status, family status, physical or mental disability, sexual orientation, pardoned conviction, or other personal characteristics;
- Written or verbal abuse or threats;
- Practical jokes that embarrass or insult someone;
- Patronizing or condescending behaviour;
- Humiliating a person in front of co-workers;
- Abuse of authority that undermines a person's performance or threatens her or his ministry;
- Vandalism of personal property;
- Unwanted comments about a person's body, sexuality, or sexual conduct;
- Unwanted flirtation, sexual propositions or advances;
- Unwanted touching, pinching, or fondling;
- Demands for sexual favours in exchange for successful completion of the missionary training course or which accompany a threat of expulsion from the missionary training course, or withdrawal of employment or ministry placement;
- Physical or sexual assault.

Sexual harassment (as it relates to persons involved with Ethnos Canada) is any unwanted sexual advance or other verbal or physical conduct of a sexual nature or of a nature demeaning to a person because of their gender, when submission to or acceptance of that conduct is explicitly or implicitly made to be a condition of a person's training, employment, or ministry position with Ethnos Canada, or when the conduct creates an intimidating, hostile or offensive ministry or training environment.

It should be noted that sexual harassment can also be initiated through indirect methods of communication such as telephone calls, electronic communication, or in writing.

What is not Harassment?

- Consensual bantering and social relationships: Two or more persons bantering back and forth is not harassment if everyone involved is in agreement. But if any person feels uncomfortable with this behaviour, and the behaviour continues even after that person has expressed their discomfort, or if the others involved should have known the person was uncomfortable, the behaviour will be considered harassment. This type of behaviour can create a work environment where personnel do not feel safe and may feel constantly humiliated.

Fraternization or consensual social relationships are not considered sexual harassment so long as the relationship remains consensual on the part of both parties. However, the Bible teaches that sexual intimacy is a gift from God, which is appropriately expressed only within the bounds of marriage. Sexual relationships outside of marriage are considered the sins of adultery or fornication, constitute sexual misconduct, and will be responded to in accord with biblical disciplinary principles.

- Legitimate management intervention: Appropriate performance reviews, counselling, and discipline are not harassment.

Abuse of Authority

Abuse of authority occurs when a person in leadership uses authority unreasonably to interfere with a missionary or the missionary's ministry. It includes humiliation, intimidation, threats, and coercion. It does not include normal managerial activities, such as counselling, performance appraisals, and discipline, as long as these are not being done in a discriminatory manner.

II. Retaliation

For this policy to be effective, it is necessary that workers feel encouraged to report and assist in any investigation of a charge of workplace violence or harassment. Retaliation is seen as an attempt to undermine the expressed purposes of this policy.

Any act of retaliation against a worker reporting an allegation of workplace violence or harassment, or against a person who is assisting in an investigation under this policy, will be viewed as an act of violence or harassment in and of itself. Proven charges of retaliation will receive the same range of sanctions as proven charges of violence or harassment.

"Retaliation" includes, but is not limited to, threatened or actual adverse action regarding a person's employment, ministry position, or training status.

III. Responsibilities

1. Ethnos Canada Executive Leadership Team

It is the responsibility of the Ethnos Canada Executive Leadership Team (hereafter referred to as "ELT") to take all reasonable steps to provide a working and training environment which is free from violence and harassment.

The ELT will publicize this policy and ensure that all workers on the Durham campus have read and understand it. The policy will be reviewed annually to ensure that its implementation has been effective.

The ELT will be responsible for receiving and investigating all complaints, informing Complainants of their rights under the Ontario Human Rights Code, informing Complainants of the progress and outcome of the investigation, communicating with alleged offenders (hereafter referred to as "Respondents"), and serving as a liaison to the Board of Directors and legal counsel of Ethnos Canada when necessary.

The ELT will make every effort to ensure confidentiality and discretion to the greatest extent possible and will maintain a record of all reports of workplace violence and/or harassment, the procedure taken to deal with each report, and any sanctions imposed.

The ELT will impose an appropriate sanction for every substantiated charge of workplace violence or harassment regardless of the status of the offender within Ethnos Canada. ("Sanctions" are explained at the end of Section V.)

Recognizing the inherent problem that would exist in sanctioning a member of the ELT, the Board of Directors will take responsibility to determine an appropriate sanction for any case involving a substantiated allegation against a member of the ELT.

2. All Other Ethnos Canada workers

Ethnos Canada workers are responsible for keeping their own behaviour above reproach (according to the moral guidelines contained in the Bible) and free from violence and harassment, sexual or otherwise, as it is defined in this policy.

In accord with the principles set forth in the New Testament, if a person is observed behaving in a way that seems to be threatening, embarrassing or harassing towards someone else, the observer can and should speak up by informing the offending person in a respectful way that the behaviour is inappropriate. The observer can also inform the person being offended of his/her willingness to lend support in ending the situation.

If necessary, during an incident of workplace violence, workers should ensure their own immediate physical safety and, depending upon the level of violence occurring, attempt to contact a member of Ethnos Canada leadership or local law enforcement for assistance.

All workers will be expected to cooperate in the investigation of a workplace violence or harassment complaint. Anyone who gives evidence in an investigation, or who is otherwise involved in the process, must keep this information confidential, except as is necessary to deal effectively with the complaint. These are serious issues, and people's privacy must be respected. Even after a complaint is resolved, confidentiality and respect are important.

Complaints of workplace violence or harassment which upon investigation are determined to be both false and misleading will be considered defamation of character, slander, and gossip.

IV. Procedures

1. How to Report Workplace Violence and/or Harassment

Workers can report incidents or complaints verbally or in writing. When submitting a written complaint, please use the **Workplace Violence and Harassment Report** form. When reporting verbally, the person to whom the verbal report is being given will sign the report, along with the worker complaining of workplace violence or harassment.

The report of the incident should include the following information:

- a. Name(s) and contact information of the worker(s) who allegedly experienced workplace violence and/or harassment (i.e. the "Complainant").
- b. Name, position and contact information (if known) of the alleged offender(s) (i.e. the "Respondent")
- c. Names of the witness(es) (if any) or other person(s) with relevant information to provide about the incident (if any) and contact information (if known).
- d. Details of what happened including date(s), frequency and location(s) of the alleged incident(s).
 - i. Any supporting documents the Complainant may have in his/her possession that is relevant to the complaint.
 - ii. List any documents a witness, another person or the Respondent may have in their possession that is relevant to the complaint.

2. Who to Report Workplace Violence and Harassment

If the worker feels comfortable doing so when an incident is occurring, he/she should tell the alleged offender that the objectionable behaviour is unacceptable and considered to be workplace violence or harassment.

An incident or complaint of workplace violence or harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.

Report a workplace violence or harassment incident to your department leadership. If the alleged offender is your department leadership, contact a member of the ELT. If alleged offender is a member of the ELT, contact one of the other members of the ELT or the Chairman of the Board of Directors.

Tim Whatley (ELT)	519-375-6367	timwhatley@ethnos.ca
Edwin Esau (ELT)	519-369-7118	edwinesau@ethnos.ca
Pete Humphreys (ELT)	519-369-5455	petehumphreys@ethnos.ca
Brian Esau (Board Chair)	204-371-6564	besau@redrivermutual.com

3. Investigation

a. Who Will Investigate

The ELT will determine who will conduct the investigation into the incident or complaint of workplace violence or harassment. If the allegation pertains to a member of the ELT, the Board of Directors will either conduct the investigation themselves or will engage the services of an impartial party outside of Ethnos Canada to conduct the investigation. If the allegation pertains to a member of the Board of Directors, the ELT will engage an impartial party outside of Ethnos Canada to conduct the investigation.

b. Timing of the Investigation

The investigation must be completed in a timely manner and generally within 30 working days or less unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.

c. Investigative Process

The person conducting the investigation, whether internal or external to the workplace, will, at minimum, complete the following:

- i. The investigator must ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation. The investigator should remind the parties of this confidentiality obligation at the beginning of the investigation.
- ii. The investigator should advise all parties to the investigation that they may have representation present during interviews.
- iii. The investigator must thoroughly interview the Complainant and the Respondent, if the Respondent is an Ethnos Canada worker. If the Respondent is not a worker, the investigator should make reasonable efforts to interview him/her/them.
- iv. 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 reply.
- v. The investigator must interview any relevant witnesses associated with Ethnos Canada who may be identified by either the Complainant, the Respondent or as necessary to conduct a thorough investigation. The investigator must make reasonable efforts to interview any other relevant witnesses not directly associated with Ethnos Canada if there are any identified.
- vi. The investigator must collect and review any relevant documents.
- vii. The investigator must take appropriate notes and statements during interviews with the Complainant, the Respondent and any witnesses.
- viii. The investigator must prepare a written report summarizing the steps taken during the investigation, the allegations of the Complainant, the response from the Respondent, the

evidence of any witnesses, and the evidence gathered. The report must set out findings of fact and conclusion as to whether or not the incident(s) reported was workplace violence or harassment.

d. Results of the Investigation

The investigator must prepare a written report of the investigation findings and forward that report to the ELT within thirty (30) working days from the time the Respondent was notified of the complaint.

The ELT must make a decision with respect to sanctions, if warranted, within thirty (30) working days of receiving the report and notify the Complainant and Respondent in writing of the outcome.

e. Confidentiality

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

While the investigation is on-going, the Complainant, the Respondent and any witnesses should not discuss the incident, complaint or the investigation with each other, other workers or witnesses 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 will be kept confidential.

f. Sanctions and Corrective Action

If the investigation leads to the conclusion that workplace violence or harassment has occurred, the ELT will act promptly and fairly in imposing an appropriate sanction and corrective action. Sanctions may range from a reprimand and written report placed in the Respondent's file, to dismissal from employment and/or association with Ethnos Canada.

Corrective actions (where appropriate) may be considered, depending upon the nature of the incident(s). Possible actions might include, but are not limited to:

- Apology
- Training
- Reassignment or relocation
- Referral to an assistance program
- Suspension or termination of employment
- Legal action

Seniority or status with Ethnos Canada will not affect the decision as to the appropriate sanction and/or corrective action in the circumstances. All investigations resulting in the conclusion that workplace violence or harassment of a more serious nature has occurred will be reported to the Board of Directors.

4. Record-Keeping

Ethnos Canada will keep records of the investigation including:

- a. a copy of the complaint or details about the incident;
- b. a record of the investigation including notes;
- c. a copy of the investigation report (if any);
- d. a summary of the results of the investigation that was provided to the Complainant and the Respondent, if a worker or member of leadership;
- e. a copy of any corrective action taken to address the issue/complaint.

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

Records will be kept for a minimum of two years.

5. Evaluation

The policy will be reviewed on an annual basis to ensure that it conforms with any changes to the Occupational Health and Safety Act, Code and Regulations and that it continues to address the needs of the organization regarding workplace violence and harassment. The evaluation should therefore include a needs assessment, process evaluation, and outcome evaluation.

V. Conclusion

There is no place for violence or harassment where brothers and sisters in Christ seek to walk with the Lord and minister to one another. We at Ethnos Canada will continually work to promote an environment where these goals may be realized, in order that our testimony to a world in need of Christ will remain clear and the Gospel might go forth unhindered.

Date created: June 2, 2019 Annual review date: _____