



City Policy

Section: Human Resources

NO: HR – RESP - 01

Reference: Respect in the Workplace (Part I)

Date: March 25, 2024

**Next Review Date:
March 2025**

TITLE: Workplace Harassment Policy & Procedure

1. 0 Policy Statement

- 1.1 The Corporation of the City of Dryden recognizes the importance of having a harmonious workplace which preserves personal dignity and encourages mutual respect, support and understanding amongst employees.
- 1.2 All employees have the right to work in an environment that is free from discrimination and/or harassment/bullying. The Corporation may be held legally liable for the acts of its employees, volunteers, boards, coop placement personnel students, consultants, contractors and members of Council, who engage in or condone workplace harassment/bullying, either openly or through failure to act or failure to report.
- 1.3 The Corporation of the City of Dryden considers discrimination and workplace harassment/bullying as serious misconduct. As such, it is committed to creating and maintaining a work environment that is characterized by the principles of respect, tolerance and harmony; that is free of discrimination and workplace harassment/bullying, and where every person is treated with dignity and respect.
- 1.4 All City employees have a responsibility to respect the dignity, worth and human rights of their coworkers and the public they serve.
- 1.5 Managers and supervisors have additional responsibilities. They are obligated to discourage discrimination and harassment/bullying in the workplace; to take reasonable steps to prevent the afore mentioned incidents; and to take appropriate corrective action to deal with discrimination and harassment/bullying if and when they occur.

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- 1.6 The City of Dryden will not discriminate or retaliate against employees because they are, or are perceived to be, victims of discrimination or harassment/bullying.
 - 1.7 Noncompliance with respect to this Program and policy will give rise to disciplinary action up to, and including, termination.
 - 1.8 When administering this program, the City of Dryden shall do so in a fair and unbiased manner.
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2.0 Objectives

- 2.1 The City of Dryden's **Respect in the Workplace Program** has been developed in order to:
 - (a) Demonstrate and promote commitment to human rights, diversity, tolerance and workplace harmony;
 - (b) Ensure that all policies and practices comply with the provisions of Ontario's Human Rights Code;
 - (c) Enhance community relations;
 - (d) Aid in the prevention of discrimination and harassment/bullying in the workplace; provide an impartial and efficient complaints procedure to resolve complaints;
 - (e) Ensure that all complaints are dealt with confidentially and objectively and that the rights and dignity of all parties are respected; and,
 - (f) Provide employees and managers in all departments with fair and consistent procedures for preventing and dealing with complaints of discrimination and workplace harassment/bullying.

3.0 Application

- 3.1 This program applies to all employees of the City of Dryden, as well as to volunteers, boards, co-op placement personnel, students, agents of the Corporation, consultants, contractors and Council in their dealings with employees, volunteers, co-op placement personnel, students, agents, consultants and contractors.

4.0 Scope, Definitions and Examples

4.1 Human Rights Code Provisions:

Ontario's Human Rights Code prohibits discrimination in employment and harassment in the workplace by the employer, an agent of the employer or an employee because of:

- (a) Age;
- (b) Creed (religion);
- (c) Sex (including pregnancy and breastfeeding);
- (d) Sexual orientation;
- (e) Gender identity;
- (f) Gender expression;
- (g) Family status (such as being in a parent-child relationship);
- (h) 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);

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- (i) Disability (including mental, physical, developmental or learning disabilities);
- (j) Race;
- (k) Ancestry;
- (l) Place of origin;
- (m) Ethnic origin;
- (n) Citizenship;
- (o) Colour;
- (p) Record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received);
- (q) Association or relationship with a person identified by one of the above grounds;
- (r) Perception that one of the above grounds applies.

4.2 “Harassment” means 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.

4.3 “Discrimination” means 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.

4.4 Examples of Harassment include but are not limited to:

- (a) Racial or ethnic slurs;
- (b) Epithets, remarks, jokes or innuendos related to a person's race, gender identity, gender expression, sex, disability, sexual orientation, creed, age, or any other ground;
- (c) Posting or circulating offensive pictures, graffiti or materials, whether in print form or via e-mail or other electronic means;
- (d) Singling out a person for humiliating or demeaning "teasing" or jokes because they are a member of a Code-protected group;
- (e) 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;
- (f) Unwelcome or unnecessary physical contact;
- (g) Physical assault;
- (h) Refusal to converse or work with an employee because of their ethnic or racial origin, sexual orientation, or any ground on which discrimination or harassment is prohibited; and,
- (i) Reprisals based on political or labour group affiliations.

NOTE: A series of seemingly minor offences can constitute harassment even though each offence in and of itself does not seem serious. Frequency of occurrence, repeated offences or a pattern of offensive behaviours are considerations in determining whether or not a person's behaviour constitutes harassment

4.5 "Sexual Harassment" as defined by the Human Rights Code, includes, but is not limited to:

- (a) An unwelcome sexual solicitation or advance made by a person who is in a position to confer, grant, or deny a benefit or advancement; and/or,

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- (b) A reprisal or threat of reprisal for the rejection of a sexual solicitation or advance where the reprisal is made or threatened by a person in a position to confer, grant or deny a benefit or advancement.

However, according to Human Rights case law, the harasser does not need to be in a position to confer, grant, or deny a benefit or advancement for a behaviour or action to constitute sexual harassment.

4.6 Examples of Sexual or Gender based Harassment – this can include but is not limited to:

- (a) Unwelcome or offensive sexual remarks, slurs, taunting, jokes, invitations, innuendos, requests or suggestions;
- (b) Practical jokes of a sexual nature that causes awkwardness or embarrassment;
- (c) Inappropriate and unwelcome comments about a person's body, physical appearance or attire;
- (d) Unwelcome comments about a person's sex life;
- (e) Unwelcome sexual advances, propositions or attention including demands for dates or sexual favours;
- (f) Obscene language;
- (g) Unnecessary or unwelcome physical contact such as touching, patting, pinching or fondling;
- (h) Written or verbal abuse or threats;
- (i) Sexual/physical assault, abuse or molestation;
- (j) Gender-related comments about a person's physical characteristics or mannerisms;
- (k) Paternalism based on gender which a person feels undermines his or her self-respect or position of responsibility;

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- (l) Suggestive or offensive remarks or innuendoes about members of a specific gender;
 - (m) Gender-related verbal abuse, threats or taunting;
 - (n) Bragging about sexual prowess or questions or discussions about sexual activities;
 - (o) Displays of pornographic or sexist pictures, graffiti or other material;
 - (p) Leering, sexually aggressive, offensive or insulting gestures; and,
 - (q) Attainment and distribution of improper information from the Internet or via email.
- 4.7 “Bullying” is defined as typically a form of repeated, persistent, and aggressive behaviour directed at an individual or individuals that is intended to cause, or ought reasonably to be known to cause fear and distress and/or harm to another person’s body, feelings, self-esteem, or reputation. Bullying occurs in a context where there is a real or perceived power imbalance.
- 4.8 Examples can include but are not limited to:
- (a) Criticism that is persistent and non-constructive; false allegations of incompetence are made;
 - (b) Withholding necessary information or purposely giving the wrong information;
 - (c) Impossible work targets are set with inadequate or no negotiation;
 - (d) Disparaging comments are being made about you behind your back; and,
 - (e) Belittling a person’s opinion(s).

5.0 Workplace Defined

- 5.1 The workplace includes all locations where business or social activities of the Corporation are conducted. This includes physical locations on or off City property, as well as web-based locations such as social media platforms or webpages. Workplace harassment/bullying may also include incidents that happen away from work (i.e. unwelcome phone calls or visits to a person’s home

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if both the harasser and the victim of the harassment are employees of the Corporation and the incident poisons the workplace).

6.0 Computer and Voice Mail Systems

- 6.1 Employees shall not use the computer system or voice mail system to create, download, send or forward any information which would be considered inappropriate and unacceptable by the City under this program. Should an employee receive any such material via computer or voice mail systems, they must immediately notify their supervisor, or alternate about the email/voicemail.
- 6.2 Further information with respect to inappropriate use can be located under the following City Policies:
- (a) MU-IN-01– Acceptable Use of Electronic Communications;
 - (b) MU-IN-02 – Email; and,
 - (c) HR-CO-01– Code of Conduct.

7.0 Responsibilities of Employee

- 7.1 All employees must comply with this Program and should discourage and report, either informally or formally any instances of workplace discrimination or harassment/bullying that they have either witnessed or been the subject of.
- 7.2 Employees are encouraged to report any incidents of workplace harassment to the appropriate personnel. The complaint can be initiated verbally but must be documented in writing.
- (a) Appropriate personnel include any supervisor or manager, the Manager of Human Resources, and the Chief Administration Officer (CAO).
- 7.3 Once informal action or a formal complaint has been initiated, any employee involved must ensure that the matter remains confidential. Employees must not disclose any information relating to an information action, a formal complaint, its

investigation and/or resolution to anyone who is not aware of the action or complaint.

8.0 Responsibilities of Supervisory Personnel

- 8.1 Supervisory personnel shall include all Managers and Supervisors. They are responsible for and must do the following:
- (a) Take all reasonable measures to prevent discrimination and harassment/bullying from happening and to provide a workplace that is free from discrimination and harassment;
 - (b) Set a good example. They must ensure that their own acts respect the rights and dignity of their subordinates and co-workers and cannot be misconstrued as discrimination and harassment/bullying;
 - (c) Let their staff know that they take the issues of workplace human rights seriously by supporting this program and not participating in or ignoring discrimination and harassment/bullying;
 - (d) Ensure that employees in their department, division or sector are aware of and familiar with this program; and,
 - (e) Act immediately on observations or allegations of discrimination or harassment/bullying. They must be alert to the possible instances of workplace discrimination or harassment/bullying by observing subordinates' interaction and immediately address instances of potential discrimination or harassment/bullying.
- 8.2 When dealing with a complaint, the Department Manager shall ensure that the complaint procedure is followed; that the complaint is dealt with promptly and fairly; that confidentiality is protected (as much as is possibly reasonable); that the rights, dignity and privacy of all parties are respected and shall keep a confidential record of all discussions.

9.0 Avenues of Complaint

9.1 Depending on the circumstances, an employee may choose any of the following avenues of complaint:

(a) Informal Action:

The employee may wish to attempt to resolve the problem themselves without filing a formal complaint.

(b) Formal Complaint:

If informal attempts at resolving the problem are inappropriate or ineffective, a formal complaint and investigation may be warranted.

9.2 Depending on the circumstances, an employee may choose any of the following avenues of complaint:

(a) Complaint Hearing Procedure/Grievance Procedure:

While any employee may file a formal complaint, a bargaining unit employee who believes that their rights under a collective agreement have been violated, may choose to file a grievance in accordance with the grievance procedure.

(b) Formal Complaint to the Human Rights Tribunal of Ontario/Canadian Human Rights Tribunal:

Whether or not a complaint has been submitted to the employer, any employee may complain to the Human Rights Tribunal about discrimination or harassment/bullying on any of the prohibited grounds listed in the Human Rights Code.

(c) Other Avenues:

Nothing in this program should be interpreted as denying or limiting access to other avenues of redress available under the law. However, the Corporation may suspend, postpone or cancel any investigation into a complaint under this program if it is believed that the investigation would duplicate or prejudice such a proceeding.

- 9.3 Although an employee may prefer to file a formal complaint, the Human Resources Manager may determine that given the circumstances surrounding the complaint, the matter should be dealt with as an informal action.

10.0 Representation

- 10.1 If employees are members of a bargaining unit, the Complainant and Respondent are entitled to union representation throughout the informal action, as well as the formal complaint process if they so choose.
- 10.2 If the Complainant or Respondent is a non-union employee, they may also have a representative accompany them throughout this process and shall be advised of such entitlement.
- 10.3 The representatives must ensure that the matter remains confidential, and not disclose any information regarding either the informal action, formal complaint, its investigation and/or resolution to anyone outside of the investigation.

11.1 Confidentiality

- 11.1 All persons involved with a complaint must ensure that the matter remains confidential. These persons include, but are not limited to witnesses, representatives, managers/supervisors, the Manager of Human Resources and the Investigators. An employee who discloses confidential information except as allowed under this program may be subject to discipline.
- 11.2 A complaint shall be investigated and dealt with in a discreet and confidential manner, to minimize embarrassment to either party. All investigations, interviews and deliberations shall be conducted in strict confidence to the extent possible. The Corporation will endeavour to keep all complaints, notes of interviews or meetings, investigation reports, records of disciplinary action and other related records in strict confidence. The documents will be stored with the Human Resources Department. Information about a complaint, its investigation and/or resolution shall be released only on a need-to-know basis, as determined by the Human Resources Department.
- (a) All information about an incident or complaint will be kept confidential unless disclosure is necessary for investigating, taking corrective actions or is otherwise required by law.

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- (b) Any violent acts, threats, or behaviours such as stalking, directed towards any person or child, must be reported to the police. This includes any threat of self-harm.
- (c) To the extent possible, investigation reports shall be presented in summary format.
- (d) The Corporation cannot guarantee confidentiality if the complainant chooses to initiate proceedings or make comments outside the Corporation's internal compliant process. Information collected and retained is subject to the Municipal Freedom of Information and Protection of Privacy Act.

12.0 Recommended Informal Action

12.1 Where practicable, an employee may decide to deal with the discrimination or harassment/bullying themselves. The following suggestions are intended for employees who have been harassed/bullied or who have witnessed harassment/bullying and wish to attempt to resolve the problem themselves.

These suggestions are not preconditions for filing a formal complaint.

- (a) Tell the harasser to stop:

If possible, the person should be told that the behaviour is offensive and contrary to the Corporations' Respect in the Workplace Program.

- (b) Keep a record:

The employee should make notes about the incident, with as much written information as possible including the name(s) of the person(s) you believe is harassing, bullying or discriminating against you, the location the incident(s) happened, date and time of incident(s) and the names of any possible witnesses. Clearly stating the objection in a letter or memo to the alleged harasser can be a good record of events.

- (c) Tell the supervisor or designate:

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In some situations, objecting may be difficult, or objections may be ignored. An employee should then bring any concerns to their immediate supervisor or the alleged harasser's supervisor. The incident and its effects should be explained to the supervisor. A plan of action should be agreed upon and a follow up meeting scheduled.

(d) Seek advice:

The staff of the Human Resources Department are available for confidential advice and assistance in resolving discrimination and harassment/bullying.

(e) Victim support:

Through the Employee and Family Assistance Program, personal supportive counseling is available for employees experiencing harassment/bullying in the workplace.

12.2 The following is a list of recommended measures and informal actions that managers and supervisors may take which can often prevent or resolve problems situations without a formal complaint and investigation:

- (a) Reacquaint employees with respect to proper workplace behaviour;
- (b) Approach the employee if something is suspected;
- (c) Seek advice;
- (d) Discuss the situation with the alleged harasser; and,
- (e) Keep a record

13.0 Formal Complaint Process

13.1 Right to complain:

- (a) An employee has the right to complain about a situation that they believe is harassment/bullying under this program.

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- (b) A complaint may be filed by the actual victim of alleged harassment/bullying; by a group of employees whom may have been subjected to the same offensive treatment; by a co-worker who witnesses the incidents(s); or by a third party complaining on behalf of the victim(s).
- (c) This program strictly prohibits reprisal against an employee because they have complained under the program or has provided information regarding a complaint. A reprisal is subject to the same complaints' procedures and penalties as a complaint of harassment/bullying.
- (d) However, if after investigating any complaints of discrimination or harassment/bullying, it is learned that an employee intentionally made a false complaint or provided false information regarding the complaint, disciplinary action up to and including termination may be taken against that employee.

13.2 Reporting a complaint:

- (a) A complaint should be reported as soon as possible after the action or behaviour being complained about occurred. Promptness in reporting a complaint protects the rights of both the person making the complaint (complainant) and the person complained against (respondent).

13.3 Reporting a complaint:

- (a) When bringing a formal complaint forward, as much written information as possible will need to be submitted, including the name(s) of the person(s) you believe is harassing, bullying or discriminating against you, the location the incident(s) happened, date and time of incident(s) and the names of any possible witnesses.
- (b) The letter should include the remedy sought and should be signed and dated by the complainant.
- (c) A complaint under this program may be submitted to a Supervisor, Manager, or the Manager of Human Resources. If the complaint is submitted to a Supervisor, Manager, it should be referred directly to the Manager of Human Resources within two (2) working days of receipt.

- (d) Although an employee may file a formal complaint, the Manager of Human Resources may determine, given the circumstances surrounding the complaint, the matter will be dealt with as an informal action. If the Manager of Human Resources does not determine that the complaint will be dealt with informally, the Manager of Human Resources may choose to investigate the complaint, depending on the nature of the allegations, the Corporation may choose to use an external investigator to conduct the investigation. The Corporation will determine whether an external investigator is required.
- (e) With the exception of a complaint made under section 14.2, the Manager of Human Resources will inform the CAO of the fact that a formal complaint has been made and that an investigation will be conducted. However, confidentiality will be maintained with respect to the identities of the person(s) involved in the complaint.

13.4 Investigation:

- (a) As soon as reasonably practicable, the person assigned shall initiate the investigation by meeting with the complainant. The complainant has the right to be accompanied by another person of their choice in any meeting with an investigator(s). The investigator(s) shall confirm receipt of the complaint, clarify details, and apprise the complainant of the steps that will be taken.
- (b) To the extent possible, the investigator(s) shall ensure that the complaint is investigated promptly and fairly, in a discreet and confidential manner so as to minimize embarrassment to all parties, in accordance with the principles of natural justice (i.e.. respondent has the opportunity to respond to the complaint).
- (c) The investigator(s) have the authority, subject to applicable laws, to speak to anyone, examine any documents and enter any work locations that are relevant to the complaint.
- (d) A person named in a complaint has the right to reply to the allegation and the right to be accompanied by a person of their choice in any meeting with an investigator(s).

- (e) Persons not named in the complaint who may have some personal knowledge about the incident may also be interviewed.
- (f) Depending upon the circumstances, the Supervisor or Manager in consultation with the Manager of Human Resources, may determine that it is appropriate to physically and/or operationally separate the employee and the alleged harasser until the investigation has been completed.

13.5 Settlement/Remedy:

- (a) Depending on the circumstances, it is often possible to resolve a complaint after only a simple investigation and without the laying of blame. For example, a complaint regarding the circulation of offensive cartoons may be resolved simply by circulating a memo prohibiting the practice.
- (b) In determining an appropriate settlement, the investigator(s) and/or Manager, in consultation with the Manager of Human Resources should endeavour as much as possible to reach a settlement that is satisfactory to both the complainant and the respondent.

13.6 Findings and Recommendations:

- (a) Once the investigation is complete, if not investigated by the Manager of Human Resources, the investigator(s) will submit a confidential written report to the Manager of Human Resources. The investigator(s) will endeavour to submit a written report within thirty (30) days from the receipt of the complaint. The report will summarize the investigator's findings and conclusions and will recommend corrective action if appropriate.
- (b) A conclusion about whether a specific incident of harassment/workplace bullying did or did not occur should be based upon the information obtained in the investigation.
- (c) If the findings do not support the complaint, the investigator will recommend that no further action is necessary and that the matter be closed. However, if the findings do support the complaint, the investigator(s) will recommend measures to correct the situation.

- (d) In these situations, the CAO may approve, change, or reject any of the investigator's recommendations. For all other formal complaint investigations, the Manager of Human Resources will only inform the applicable parties of the identities of the individuals, the content of the complaint, the corrective actions, resolution or results of the investigation.
- (e) Once the report has been finalized and approved by the investigator(s), the investigator(s) shall meet with the complainant and next with the respondent. The complainant and the respondent will be informed in writing the results of the investigation and of any corrective action that has been or will be taken as a result of the investigation. Both parties have the right to review and comment on the report prior to any disciplinary action being taken by the Corporation.

13.2 Discipline and Counselling:

- (a) Depending on the circumstances, if an employee is found to have engaged in harassment/bullying under this program, such conduct will be considered a form of employee misconduct. As in any case of misconduct, corrective action may include counseling and/or disciplinary action, if required, shall be subject to the process outlined in the City's Discipline policy HR-DI-01.
- (b) The appropriate counselling or disciplinary action imposed, if any, shall be determined by mutual agreement of the Manager of Human Resources and the affected Department Manager/Director or CAO or Council (for complaints involving the CAO, based on the circumstances of the case).
- (c) In accordance with the City of Dryden policy HR - DI – 01 – Discipline, no employees shall be terminated without authorization of the CAO or Council (for complaints involving the CAO, based on the circumstances of the case).

14.0 Complaints

All complaints involving a:

14.1 Supervisor or Manager:

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- (a) Shall be submitted to the CAO and or the Manager of Human Resources.
- (b) The CAO may investigate personally, in conjunction with the Manager of Human Resources and/or investigator(s);
- (c) The investigation will be conducted in accordance with the provisions of this program;
- (d) The CAO will review the report and recommendations before making a final decision.
- (e) The CAO may approve, change, or reject any of the report and recommendations.
- (f) The results of the investigation and any corrective actions will be provided to the employee who alleged workplace harassment and to the alleged harasser (if the alleged harasser is a worker of the same employer)
- (g) The CAO will provide Council with a confidential memorandum where serious disciplinary action and/or termination may occur.

14.2 CAO:

- (a) Shall be submitted to the Human Resources Manager and the Human Resources Manager shall advise the Mayor;
- (b) The Human Resources Manager shall seek an outside consultant;
- (c) The process shall be in accordance with the provisions of this program;
- (d) City Council may approve, change, or reject any of the report and/or recommendations; and,
- (e) Parties involved have the right to review and comment on the report submitted.

14.3 Mayor or Member of Council:

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- (a) Shall be submitted to the CAO in consultation with the Manager of Human Resources;
- (b) The CAO shall advise the Mayor (or Council);
- (c) The CAO shall promptly speak to the Mayor or the member of Council involved and attempt to resolve the matter;
- (d) If the matter cannot be resolved, Council shall be advised, and an outside qualified consultant shall be retained by the City;
- (e) The process shall be in accordance with the provisions of this program;
- (f) The Council may approve, change, or reject any of the report and/or recommendations; and,
- (g) The results of the investigation and any corrective actions will be provided to the employee who alleged workplace harassment and to the alleged harasser (if the alleged harasser is a worker of the same employer)

15.0 Filing a Complaint with the Human Rights Tribunal of Ontario or The Canadian Human Rights Tribunal

- 15.1 Whether or not a complaint has been submitted to the employer, any employee may file a complaint of harassment with the Human Rights Tribunal of Ontario.
- 15.2 An employee may contact the Tribunal through one of the following methods:

A. Human Rights Tribunal of Ontario (HRTO)

655 Bay Street, 14th Floor

Toronto, ON M7A 2A3

Tel: (416) 326-1312

Toll Free: 1-866-598-0322

TTY (Toll Free): 1-866-607-1240 email: hrtto.registrar@ontario.ca

B. Human Rights Legal Support Centre (HRLSC)

180 Dundas Street West, 8th Floor

Toronto, ON M7A 0A1

Tel: (416) 597-4900

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Toll Free: 1-866625-5179
TTY: (416) 597-4903
TTY Toll Free: 1-866 612-8627
www.hrlsc.on.ca

C. Canadian Human Rights Tribunal
Ottawa Office
Tel: 613-995-1707
Toll Free: 1-844-899-3604
TTY: 613-947-1070
Email: registrar@chrt-tcdplgc.ca

16.0 Education and Training

- 16.1 All new employees shall be made aware of this policy through the employee orientation process.
- 16.2 Managers shall ensure that a copy of this policy is readily accessible in the workplace and shall ensure that all employees under their direction are aware of and comply with this program. All Supervisory Personnel shall act as good role models.
- 16.3 All employees must be aware of the policy and all supervisory personnel shall act as good role models.
- 16.4 The City of Dryden through the Human Resources Department will provide the appropriate, necessary and on-going training in relation to this policy.
- 16.5 This policy will be reviewed annually or sooner as required, in consultation with the Joint Health and Safety Committees or health and safety representatives.

History			
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Amendment Date:	October 6, 2020	Approved by:	CAO
Amendment Date:	February 22, 2023	Approved by:	CAO
Amendment Date:	March 25, 2024	Approved by:	By-law 2024-20

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