



Respecting Diversity at LONDON TOWN CO-OPERATIVE HOMES INC.

The policy is to outline the London Town Co-operative Homes Inc. commitment to providing and maintaining an environment which ensures that all members/staff are treated with dignity and respect and are able to live and work in an environment free from discrimination and harassment.

Respecting Diversity at London Town Co-operative Homes Inc.

- Human Rights Policy
 - Respecting Diversity
 - Prohibited Grounds
- Discrimination Policy
 - Definition
- Workplace/Co-op Community Harassment Policy
 - Definition
 - Examples
 - Sexual Harassment
- Workplace/Co-op Community Violence Policy
 - Definition
 - Responsibility
 - Procedure
- Appendix
 - Procedures
 - Violent Incident Report Form
 - Checklist
 - Acknowledgement Form

Human Rights Policy

This section includes specific information about Diversity, Discrimination and Harassment.

OVERVIEW:

Respecting Diversity

Success at London Town Co-operative Homes Inc. hinges on our ability to draw upon the unique talents of each and every one of us. It is critical that you value the diversity of members, staff, contractors and suppliers. This means acknowledging and respecting the differences of others and ensuring the inclusion of ideas, people and practices.

Fair and equitable treatment of others is everyone's responsibility. You are accountable for providing an environment free of harassment and discrimination. You are expected to treat others as you would like to be treated. At the same time, London Town Co-operative Homes Inc. will ensure all human resources practices (hiring, training, and compensation) result in the fair and equitable treatment of both current and prospective staff.

To ensure an environment which values diversity is maintained, your responsibility, should you experience or observe any form of discrimination or harassment at London Town Co-operative Homes Inc. is to advise the person that the behavior is unacceptable and request that they stop or alter their behavior. London Town Co-operative Homes Inc. does not tolerate discrimination or harassment, nor reprisals against anyone who brings forward a discrimination or harassment concern. Should you experience harassment or discrimination at London Town Co-operative Homes Inc., please refer to the "Steps to Address a Complaint of Harassment or Discrimination" in the *Appendix* of this document.

London Town Co-operative Homes Inc. endorses and practices respect for human rights in its relationships with members, staff, contractors, clients, Board Members and suppliers. The Association recognizes the right of every individual to equality of opportunity with respect to their employment/membership based upon their qualifications and is committed to providing an environment in which all people are treated with dignity and respect.

The Association supports the principles of, and complies with, all applicable human rights legislation. London Town Co-operative Homes Inc. will not tolerate behavior in the environment that is contrary to applicable human rights legislation.

Unlawful discrimination and harassment is prohibited whether it is committed by fellow team members, clients, volunteers, suppliers, vendors or board members. You may not engage in any prohibited conduct against another London Town Co-operative Homes Inc. member, staff, contractor, supplier, Board Member or client.

Prohibited Grounds of Discrimination and Harassment

London Town Co-operative Homes Inc. is committed to maintaining an environment that is free from unlawful discrimination and harassment. The prohibited grounds of discrimination and harassment include those set out under Ontario's Human Rights Code and/or any other grounds protected by law. For greater certainty, the Prohibited Grounds include:

1. Race
2. Nationality or national origin (i.e. place of origin)
3. Ethnic background or origin
4. Religion or creed, or religious belief, association or activity
5. Age
6. Sex, including pregnancy, the possibility of pregnancy, or circumstances related to pregnancy
7. Gender-determined characteristics or circumstances
8. Sexual orientation
9. Marital or family status or same sex partnership status
10. Colour
11. Ancestry
12. Citizenship
13. Record of offences
14. Source of income
15. Political belief, association or activity
16. Physical or mental disability

Discrimination Policy

London Town Co-operative Homes Inc. is committed to ensuring that its environment is free from discrimination in all employment practices and decisions, thereby ensuring equal employment opportunities for all staff and contractors. This non-discrimination employment environment applies to all terms and conditions of your employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training.

Discrimination is differential treatment of an individual based upon their membership in a particular group (real or perceived), rather than on their personal merit. One form that discrimination may take is harassment.

Discrimination also includes the failure to reasonably accommodate the special needs of an individual or group whose special needs are based on any of the Prohibited Grounds - unless the accommodation would create an undue hardship for the Association.

Workplace/Co-op Community Harassment Policy

Definition

“Engaging in a course of vexatious (unwanted) comment or conduct that is known or ought reasonably to be known to be unwelcome.”¹

For the purpose of this policy, harassment includes verbal, written, visual, or physical conduct that relates to any Prohibited Ground, where such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance, creates an intimidating, hostile, offensive or poisoned environment, and/or otherwise adversely affects an individual’s employment opportunities.

London Town Co-operative Homes Inc. will not knowingly permit, and will take all reasonable steps to terminate any harassment occurring in the environment, or with any activity associated with this environment. It is the Association's responsibility to provide an environment free of harassment. Any member/staff or contractor, regardless of position, who harasses other member/staff, will be disciplined up to and including immediate termination of employment for cause. The Board of Directors will immediately address any acts of harassment that occur.

Examples of Harassment

The following list provides some examples of acts that may constitute harassment;

- Verbal or physical abuse or threats, direct or electronically
- Offensive or derogatory remarks, jokes, innuendoes, or taunts about a person’s body, beliefs, or backgrounds
- Displaying pornographic, racist, or offensive pictures
- Practical jokes that cause awkwardness or embarrassment
- Singling a person out for unduly harsh or abusive treatment
- Imitation or objectionable gestures
- Unnecessary physical contact
- Outright physical assault

Prohibited conduct may occur not only through personal contact, comments, visual displays or observation, but also through exposure to media such as e-mail; display of Internet sites or other material or information on computer monitors; or radio or

¹ - As defined in Ontario Human Rights Code.

television 'talk shows' or other broadcasts containing sexually explicit, vulgar, profane or otherwise offensive language. Prohibited conduct includes sexual harassment as defined below.

Prohibited conduct may occur either on or off London Town Co-operative Homes Inc.'s premises and either during work or non-working hours. Members/staff and contractors who engage in prohibited conduct will be subject to serious disciplinary action, up to and including immediate termination of employment for cause, regardless of whether such conduct rises to the level of unlawful harassment or sexual harassment.

What is Sexual Harassment?

Unwelcome advances, requests for sexual favors, and other verbal, written, visual or physical conduct of a sexual nature are prohibited. Such conduct also constitutes unlawful sexual harassment where:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment; or
- Submission to, or rejection of, such conduct by an individual is used as the basis for employment decisions affecting such individual's employment; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or poisoned work environment.

Sexually harassing conduct may include conduct between persons of the same gender. Sexual harassment can take the form of verbal, written, visual, or physical conduct, and may include, among other things;

- a. Verbal: Sexually suggestive or obscene comments, jokes, slurs, or innuendo; persistent, unwanted flirtation or invitations for dates or other social activities; sexual advances or passes; comments consistently targeted at only one gender, even if the content is not sexual; teasing or other remarks directed toward a person because of his or her gender.
- b. Written: Sexually suggestive, derogatory, or obscene letters, notes, or invitations; sexually suggestive, derogatory or obscene e-mail communications or other electronic communication.
- c. Visual: Sexually suggestive, derogatory or obscene gestures; displaying sexually-oriented or derogatory pictures, posters, photographs, drawings, or cartoons; displaying sexually-oriented or derogatory material on computer monitors.
- d. Physical: Offensive touching; intentionally brushing against another's body; impeding or blocking another's freedom of movement.

Sexually harassing conduct may also occur either on or off London Town Co-operative Homes Inc.'s premises and either during work or non-working hours. Members/staff, Board Members and contractors who engage in sexually harassing conduct will be subject to serious disciplinary action, up to and including immediate termination of

employment for cause, regardless of whether such conduct rises to the level of unlawful harassment or sexual harassment.

London Town Co-operative Homes Inc.'s policy and procedures for resolving harassment and discrimination and discrimination complaints have been developed to:

- Create and maintain an environment free from harassment and discrimination.
- Prevent harassment and discrimination by and against members/staff.
- Establish impartial, effective and confidential procedures to resolve concerns of harassment and discrimination; and
- Educate members/staff about their responsibilities with respect to harassment and discrimination.

Note: Should you experience harassment or discrimination at London Town Co-operative Homes Inc., please refer to the “Steps to Address a Complaint of Harassment or Discrimination” in the Appendix of this Document.

Workplace/Co-op Community Violence Policy

Definition

Workplace violence includes both physical and psychological violence

Physical violence in the workplace can range from pushing, hitting, throwing objects, pinching, biting and sexual assault to the more severe cases of homicide.

Psychological violence includes verbal and written harassment or abuse, threats and threatening behavior. Even rumors and pranks can be examples of workplace violence under its broadest definition.

Responsibility

Board of Directors

- All staff including The Board of Directors are responsible for assessing the risk of violence to staff in the Association, minimizing those risks where necessary or reasonably and informing the affected staff of such risk or potential risk
- The Board of Directors is responsible for ensuring staff are trained to
 - Recognize the potential for violence
 - Follow the procedures and policies developed to minimize risk
 - Respond to incidents appropriately
 - Report and document such incidents
- The Board of Directors is responsible for ensuring proper medical care is provided for anyone involved in an incident and for securing the safety of staff, before investigating the incident or taking reports
- The Board of Directors is responsible for co-operating with police or other authorities as required during any investigation related to environment violence

Staff

- Staff is responsible for informing the Board of Directors or a Board Member of any violence or risk of violence, or unacceptable behavior they may experience or witness. This includes issues in the employee's non-work life that may impact on his or her co-worker's safety
- Staff are responsible for reporting to the Board of Directors or a Board Member any incidents of violence or close calls, according to the procedures set out in this policy
- Staff are responsible for attending any training or information sessions provided by the employer to reduce violence or risks of violence
- Staff are expected to co-operate with the police or other authorities as required during any investigation related to workplace violence and report it to the Board of Directors

Procedure

- The Board of Directors will assess the risk of violence in the environment on a periodic basis. The process shall include taking actions to remove as many risks as can be reasonably removed and instructing members/staff to recognize risk. The risk assessment shall be reviewed at least annually
- Each and every incident of violence in the workplace shall be reported immediately to the Board of Directors. The Board of Directors shall investigate the incident immediately. The Incident Report Form and Checklist (see *Appendix*) may be used to ensure proper investigation of any reported incident
- The Board of Directors shall immediately make the appropriate inquiries of the victim and/or witnesses to identify if the incident is minor or serious

If the incident is minor:

- The Board of Directors will determine if mediation is appropriate and if so, mediate or arrange for mediation of the situation
- Conduct the appropriate investigation immediately and
- Within twenty- four (24) hours, write a report outlining the details, facts and witnesses of the incident and submit the report to the Board of Directors.

If the assailant is a member/staff or contractor, the Board of Directors shall apply appropriate disciplinary measures based on the facts of the incident and the assailant's employment record.

If the incident is serious:

- The Board of Directors must first ensure the safety of members/staff and him/herself
- Ensure proper medical treatment is provided or sent for
- Contact the authorities as soon as possible (Police, and others as deemed appropriate) to report the incident

- Contact the Board of Directors as soon as possible to assess who should be involved in the investigation
- Conduct a thorough investigation, keeping detailed notes of facts, times, witnesses and witness accounts
- Within twenty-four (24) hours after completion of the investigation, write and submit a detailed report of the incident to the and the Board of Directors and any other parties required by law

APPENDIX

Procedures

- Steps to addressing a complaint of Harassment or Discrimination

Forms

- Incident Report Form
- Checklist
- Acknowledgement Form

PROCEDURES

Human Rights Policy

Steps to Addressing a Complaint of Harassment or Discrimination

i. Staff

You are required to promptly notify the following immediately if you either become aware of any possible incidents, or believe that others have been subjected to discrimination and/or harassment:

- Board of Directors

ii. Supervisors (if applicable)

You must immediately report such incidents or suspected incidents directly to the Board of Directors or a Board Member before undertaking an investigation or any other action. A staff member who fails to report allegations of discrimination or harassment, or who otherwise fails to deal properly with such allegations, may be subject to serious disciplinary action, up to and including immediate termination of employment for cause.

iii. Investigation and Response

London Town Co-operative Homes Inc. takes allegations of harassment and discrimination very seriously, and will take prompt action to thoroughly investigate allegations of discrimination and/or harassment.

Based on the findings of the investigation, the Board will take immediate and appropriate corrective action. If a staff member is found to have engaged in prohibited conduct (as defined by this policy), they will be subject to serious disciplinary action, up to and including immediate termination of employment for cause.

Immediate and appropriate steps will also be taken if any non-employee (such as a member/supplier / client / board member) is found to have engaged in prohibited conduct toward any employee of London Town Co-operative Homes Inc.

If, however, after investigating the complaint of discrimination and/or harassment, London Town Co-operative Homes Inc. determines that the complaint was not bona fide² or made in good faith, or that any staff/ member has provided false information

² - "bona fide" - Made or carried out in good faith

during the complaint investigation, disciplinary action may be taken against that person who filed the complaint or who provided false information.

iv. Confidentiality and Non-Retaliation

Complaints of alleged discrimination and/or harassment will be kept confidential to the maximum extent possible, consistent with the need for a thorough investigation.

London Town Co-operative Homes Inc. will not retaliate, or take any form of reprisal against anyone who is subjected to or witnesses discrimination and/or harassment, or against anyone who in good faith complains of discrimination and/or harassment. Any such retaliation or reprisal by anyone is strictly prohibited.

Anyone who retaliates against a complainant or witness because of a complaint of discrimination and/or harassment, or because of participation in any investigation, will be subject to serious disciplinary action, up to and including immediate termination of employment.

FORMS

INCIDENT REPORT FORM (Page 1)
London Town Co-operative Homes Inc.

Complainant Information		
Name	Job Title	
Department	Date of Incident:	Time of Incident:
Type of Incident	<input type="checkbox"/> Physical	<input type="checkbox"/> Verbal <input type="checkbox"/> Other
Description of Incident		
Location of Incident		
Medical Attention required (Please explain)		
Police called? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes give details	WSIB report issued? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Investigation conducted? <input type="checkbox"/> Yes <input type="checkbox"/> No Names of investigators involved:	Reported to Board of Directors <input type="checkbox"/> Yes <input type="checkbox"/> No	

INCIDENT REPORT FORM (Page 2)
London Town Co-operative Homes Inc.

Assailant Information			
<input type="checkbox"/> Employee <input type="checkbox"/> Member <input type="checkbox"/> Visitor <input type="checkbox"/> Supplier <input type="checkbox"/>			
<input type="checkbox"/> Other (please specify)			
Gender <input type="checkbox"/> Male <input type="checkbox"/> Female		Name (if known)	
Age	Height	Weight	Complexion
Other distinguishing marks:			
Vehicle description (if any):			
Other information			
Has the assailant been involved in any previous incidents? If yes, provide details.			
What were the factors that contributed to this incident?			
Names and contact information of witnesses?			
Please provide any other information you think is relevant			
Name of Investigator:		Signature of Investigator:	
Date:			

London Town Co-operative Homes Inc.

VIOLENT INCIDENT INVESTIGATION CHECKLIST

Use this checklist for violent incident investigations to ensure all aspects of the incident have been reviewed in your report. Prepare an Incident Report based on your findings

- Names, addresses, telephone numbers of complainants, assailants and witnesses
- Occupation of complainants, assailants, witnesses
- Date and time of incident
- Date and time of incident reported to the Board
- Exact location of incident
- Exact location of complainants, assailants and witnesses
- Activities of complainants, assailants and witnesses before, during and after the incident
- Statements of witnesses and their locations
- Detailed explanation of events in order of sequence of occurrence
- Complainants account of events
- Description of assailant(s)
- Description of any vehicles involved in the incident
- Assailant's account of events
- What participants said and did immediately before and after the incident
- Physical conditions of environment at time of incident
- Assailant's physical and mental state prior to and at the time of the incident
- Unusual activity that may have contributed to incident
- Substance use or abuse
- Relationship between complainant and assailant, if any
- Investigator's relationship to complainant or assailant, if any
- Photographs of incident site
- Diagram of incident site, location of injured worker and witnesses

**LONDON TOWN CO-OPERATIVE
HOMES INC. DISCRIMINATION,
HARASSMENT AND WORKPLACE
VOILENCE POLICY
ACKNOWLEDGMENT FORM**

I, _____, hereby acknowledge that I have received and read a copy of London Town Co-operative Homes Inc. Discrimination, Harassment and Workplace/Co-op Community Violence Policies and Procedures that applies to all members/staff, and I have carefully reviewed and understand its contents.

I understand that these policies contains the terms and conditions of my membership/employment with London Town Co-operative Homes Inc. and, in consideration of such membership/employment, I hereby accept, and agree to follow, all of those terms and conditions of membership/employment.

I further understand that, if I ever have any questions concerning the contents of these policies, or any other policy and/or procedure of London Town Co-operative Homes Inc., I may submit such questions to the Board of Directors.

London Town Co-operative Homes Inc. reserves the right to make changes to its Employee Policies and Procedures from time to time, at its sole discretion. That said, London Town Co-operative Homes Inc. will notify you of such changes and will provide you with reasonable notice of such changes.

Board of Directors: (print)

(signature)

DATE: