



## **Anti-Discrimination and Anti-Harassment Policy**

### **Policy**

Variety – The Children’s Charity believes in and is committed to a healthy, safe work environment for all our employees. Variety – The Children’s Charity has developed a company policy intended to prevent discrimination and harassment and to deal with any incident that might occur quickly and effectively. This policy is applicable to all Variety – The Children’s Charity entities including Variety – The Children’s Charity, Variety Village, Variety Ability Systems Inc. (VASI) and Bingo Country gaming operations.

### **Definition of Discrimination, Harassment and Sexual Harassment**

*Discrimination* refers to treating people differently, negatively or adversely because of their race, age, religion, sex, etc. Discrimination can be direct and obvious such as being called insulting names or job postings which state ‘women need not apply’. Discrimination may also be more subtle and harder to detect or stop. Discrimination may come from an individual or through systems and attitudes within institutions.

*Harassment* is any behaviour that demeans, humiliates or embarrasses a person, and that a reasonable person should have known would be unwelcome. Harassment is a type of discrimination.

The Canadian Human Rights Act prohibits harassment and discrimination based on:

- Race
- National or ethnic origin
- Colour
- Religion
- Age
- Sex
- Marital status
- Family status
- Disability
- Pardoned conviction
- Sexual orientation

**Behaviour that may constitute discrimination or harassment includes but is not limited to:**

- Derogatory or inappropriate comments, teasing and jokes;
- Display or circulation of any inappropriate, derogatory or offensive written materials, cartoons or pictures;
- Creation of an unpleasant, intimidating or intolerable environment through a pattern of offensive, threatening or hostile comments or conducts;
- Stalking;
- Inappropriate physical contact;
- Physical or verbal abuse;
- Refusing to communicate, converse or work with an individual;
- Sexual assault/abuse;
- Suggestive looks, leering, staring or gestures;
- Unwelcome and unsolicited sexual advances.

*Sexual Harassment* refers to one or a series of comments or conduct of a gender-related or sexual nature that is known or might be reasonably known to be unwelcome, unwanted, offensive, intimidating, hostile or inappropriate. It refers to unwanted sexual advances, unwanted requests for sexual favours, and other unwanted verbal or physical conduct of a sexual nature. Examples of sexual harassment include gestures, remarks, pinching, dirty jokes, the display of sexually offensive material, comments, suggestions, innuendoes, and threats.

### **Procedure if you are experiencing discrimination or harassment:**

**Speak Up:** If you believe you are being harassed, speak up right away. If possible, tell the person that you are not comfortable with their behaviour, and want it to stop. You can speak to them directly, or write them a letter (date it and keep a copy). In addition, tell someone you trust what is going on.

**Record notes:** Keep a record of all unwelcome or harassing behaviour (date, times, locations, possible witnesses, what happened, your response). This will strengthen your case and help you remember details over time.

**Report it:** If, after asking the harasser to stop his/her behaviour, the harassment continues, report the problem to your Supervisor, Manager or the Human Resources Department.

Dealing with a Complaint:

1. Once a complaint is received, it will be kept strictly confidential. An investigation will be undertaken immediately and all necessary steps taken to resolve the problem.
2. Both the complainant and the alleged harasser/discriminator will be interviewed, as will any individuals who may be able to provide relevant information. All information will be kept in confidence.
3. If the investigation reveals evidence to support the complaint of harassment or discrimination, the harasser/discriminator will be disciplined appropriately. Discipline may include suspension without pay or dismissal with cause, and the incident will be documented in the harasser/discriminator's file.
4. If the investigation fails to find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged harasser/discriminator.
5. Regardless of the outcome of a harassment or discrimination complaint made in good faith, the employee lodging the complaint, as well as anyone providing information, will be protected from any form of retaliation by either co-workers or superiors. This includes dismissal, demotion, unwanted transfer, denial of opportunities within the company or harassment of an individual as a result of her/his having made a complaint or having provided evidence regarding the complaint.

### **Responsibility of Management**

It is the responsibility of a director, manager or any person within Variety – The Children's Charity and Variety's entities supervising one or more employees to take immediate and appropriate action to report or deal with incidents of harassment of any type whether brought to their attention or personally observed. Under no circumstances should a legitimate complaint be dismissed or downplayed nor should the complainant be told to deal with it personally.

**Variety – The Children’s Charity and its entities has a responsibility to:**

1. Provide all employees with harassment and discrimination education;
2. Provide an environment that encourages prospective complainants to report all incidents of harassment or discrimination;
3. Provide a process to handle and investigate harassment and discrimination complaints.

**Management has a responsibility to:**

1. Protect all employees from harassment and discrimination;
2. Respond immediately to complaints;
3. Discipline those employees found in violation of this policy;
4. Take corrective action when they are aware of harassment and discrimination.

**Employees have a responsibility to:**

1. Ensure that their work environment is free from harassment and discrimination;
2. Refrain from engaging in any behaviour that may be perceived as harassment or discrimination;
3. Report incidents of harassment and discrimination.

Variety – The Children’s Charity seeks to provide a safe, healthy and rewarding work environment for its employees. **Harassment and Discrimination will not be tolerated!** If you feel you are being harassed, contact us. We want to hear from you.