

## WORKPLACE VIOLENCE AND HARASSMENT POLICY

Red Deer Regional Airport Authority believes in the prevention of violence and promotes a violence-free workplace in which all people respect one another and work together to achieve common goals. Any act of violence is unacceptable conduct that will not be tolerated.

In addition, every worker is entitled to a workplace free of harassment. Red Deer Regional Airport is committed to a harassment-free workplace where everyone is treated with dignity and respect and will make every reasonable effort to ensure that no worker is subjected to harassment.

Harassment and violence are defined as any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment.

Any employee or individual affiliated with Red Deer Regional Airport that subjects an individual to workplace violence or harassment may be subject to disciplinary action, up to and including dismissal. This policy applies to all activities that occur on Red Deer Regional Airport premises or while engaging in Red Deer Regional Airport business, activities, or social events and applies to all employees, contractors, suppliers, and tenants. This policy also applies to all social media interactions and electronic communications.

In support of this policy, we have put in place workplace violence and harassment prevention procedures. It includes measures and procedures to protect workers from workplace violence and harassment, a means of summoning immediate assistance, and a process for workers to report incidents or raise concerns. Red Deer Regional Airport will ensure this policy and supporting procedures are implemented and maintained. All workers and management will receive relevant information and instruction on the contents of this policy and procedures.

Management will adhere to this policy and the supporting procedures. Management is 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 procedures. All workers are required to raise any concerns about workplace violence and/or harassment and to report any violent incidents or threats or harassment incidents to their supervisor.

Red Deer Regional Airport will investigate and take appropriate corrective actions to address all incidents and complaints of workplace violence and/or harassment in a fair and timely manner.

Red Deer Regional Airport pledges to respect the privacy of all concerned as much as possible. Red Deer Regional Airport will not disclose the circumstances related to an incident of violence or harassment or the names of the complainant, the individual alleged to have committed the violence or harassment, and any witnesses, except where necessary to investigate the incident or to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, to inform workers of a specific or general threat of violence or potential violence, or as required by law. Red Deer Regional Airport will disclose only the minimum amount of personal information required that is necessary to inform workers of a specific or general threat of violence or potential violence.

No worker can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving workplace violence.

This policy does not discourage a worker from exercising the worker's rights under any other law.

## COMMITMENT

RDRAA is committed to providing a safe, healthy, and supportive working environment by treating our employees and clients with respect, fairness, and sensitivity. Violence and harassment in the workplace can have devastating effects on the quality of life for our employees and on the productivity of the organization.

RDRAA has established procedures, policies, and work arrangements to *eliminate* the risk to employees from violence and harassment. If the elimination of risk to employees is not possible, RDRAA will then establish procedures, policies, and work environment arrangements to *minimize* the risk to employees. RDRAA will inform employees who may be exposed to the risk of violence and harassment of the nature and extent of the risk by:

- Performing a risk assessment if there is risk of injury to employees from violence and harassment.
- Providing information related to the risk of violence from persons who have a history of violent behavior and whom employees are likely to encounter in the course of their work.

RDRAA encourages preventive steps to maintain a safe workplace, for conflict resolution, and improvement of poor communication, by addressing each instance promptly and effectively.

## DEFINITIONS

**Designated Recipient** - a work unit in a workplace or person that is designated by RDRAA (person receiving a report of workplace violence or harassment)

**Occurrence** - an occurrence of harassment and/or violence in the workplace

**Principal Party** - an employee or employer who is the object of an occurrence (person subjected to workplace violence or harassment)

**Responding Party** - the person who is alleged to have been responsible for the occurrence in notice of an occurrence (perpetrator of workplace violence or harassment)

**Witness** - a person who witnessed an occurrence or is informed of an occurrence by the Principal Party or Responding Party

**Applicable Partner** - Health & Safety Representative

## HARASSMENT

Harassment is a serious issue and creates an unhealthy work environment resulting in psychological harm to workers. It affects the lives of workers both on the job and in their personal lives and affects the quality of their performance. Not only is harassment a violation of company policy, but it is also against the law.

It does not include any reasonable conduct of a supervisor, or RDRAA, related to the normal management of workers or a work site. Differences of opinion or minor disagreements between coworkers are also not generally considered to be workplace harassment if steps are taken to resolve the conflict.

RDRAA does not tolerate harassment, discrimination or bullying in the workplace. Differences between individuals are not only tolerated, but they are valued. As an employee of RDRAA, you can expect to be treated in a fair and professional manner. The following behaviors are unacceptable under RDRAA's terms of employment.

- **Harassment - sexual, emotional, physical**
  - **Sexual harassment** is unwelcome conduct of a sexual nature that adversely affects the work environment or leads to adverse job-related consequences. Sexual harassment can occur in the workplace or outside the workplace and can interfere with an employee's ability to do a job or create a hostile or intimidating work environment.
  - **Emotional harassment** is any kind of abuse that is emotional in nature. It can include anything from verbal abuse and constant criticism to more subtle tactics, such as repeated disapproval or even the refusal to ever be pleased.
  - **Physical harassment** is any kind of abuse that is physical in nature. It can include anything from hitting, pushing, kicking, poking, tripping, and unwanted touching of any kind.
- **Discrimination**
  - **Discrimination** is the exclusion or rejection of an individual based on their gender, race, religious beliefs, sexual orientation, political views, age, or any other social category.
- **Bullying (including cyberbullying)**
  - Bullying is any form of unwelcome or uninvited behavior that intimidates or offends a person and generally takes the form of one or more of these overtly aggressive behaviors.
    - Abusive, insulting, or offensive language.
    - Criticism delivered by yelling and screaming.
    - Inappropriate comments about a person's appearance, lifestyle, or family.
    - Teasing or regularly making someone the brunt of practical and oral jokes.
    - Interfering with personal effects and or work equipment.
    - Overloading a person with work and setting unreasonable or difficult timelines.

All personnel are required to abide and uphold others to this policy. When a Principal Party's allegations are substantiated, disciplinary action will be taken against the Responding Party in accordance with RDRAA's disciplinary procedures. Those who fail to prevent harassment, or take prompt action when harassment is reported, may also be subjected to disciplinary action.

This policy is not limited to the workplace or work hours. This policy extends to all functions and places that are work related (i.e., work functions, conferences, parties, and client functions).

## VIOLENCE

We recognize the potential for workplace violence and other aggressive behavior directed at our employees. We will not tolerate behavior from anyone that intimidates, threatens, harasses, abuses, injures, or otherwise victimizes our employees. We will take whatever steps are appropriate to protect our employees from potential hazards associated with workplace violence.

We are committed to providing our employees with an appropriate level of protection from the hazards associated with workplace violence.

Violence can include:

- physical attack or aggression.
- threatening behaviour.
- verbal or written threats.
- domestic violence.
- sexual violence.

### Indicators of Problem Behavior

Below is a list of behaviors and attitudes that may be indicators of disruptive, threatening, or violent behavior. If you observe a **pattern** of such behaviors and attitudes that may cause you concern, please let your supervisor know immediately.

- Upset over recent event(s) [work or personal crisis].
- Recent major change in behavior, demeanor, or appearance.
- Recently have withdrawn from normal activities from family, friends, or co-employees.
- Intimidating, verbally abusive, harasses or mistreats others.
- Challenges/resists authority.
- Blames others for problems in life or work; suspicious; holds grudges.
- Use/abuse of drugs and/or alcohol.
- Unwelcome obsessive romantic attention.
- Stalking.
- Makes threatening references to other incidents of violence.
- Makes threats to harm self, others, or property.
- Weapons - has or is fascinated with weapons.
- Has known history of violence.
- Has communicated specific proposed act(s) of disruption or violence.

### Roles and Responsibilities of Workplace Parties

Managers/Supervisors

- Enforce policy and procedures and monitor worker compliance.
- Facilitate medical attention for employee(s) as required.
- Ensure the workplace violence and harassment prevention program is reviewed at least annually or in response to incident investigation.

Director, Safety & Security [Designated Recipient]

- Enforce policy and procedures and monitor worker compliance.
- Identify and alert staff to violent persons and hazardous situations.
- Investigate all workplace violence/harassment using the organization's accident investigation procedure and form and/or third-party investigator, and contact the police as required.
- Facilitate medical attention for employee(s) as required.
- Debrief those involved in the incident either directly or indirectly.
- Ensure that both employees (the Principal Party and the Responding Party) receive further counselling about their legal rights.
- Track and analyze incidents for trending and prevention initiatives.
- Immediately report a death or critical injury to the Head of Compliance and Enforcement (within 24 hours after becoming aware of the death) and the policing authority (as required) and investigate.
- Report the circumstance to all parties in writing within 48 hours. Include information and particulars prescribed by legal requirements.
- Issue a report to the Accountable Executive, WCB, and the Canada Labour Board on all lost-time incidents where a worker requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days.
- Ensure the workplace violence and harassment prevention program is reviewed at least annually or in response to incident investigation.
- On or before March 1st of each year, provide the Head of Compliance and Enforcement with an annual report, detailing occurrences for the previous year.

Employees

- Participate in education and training programs so you can respond suitably to any incident of workplace violence or harassment.
- Understand and comply with the violence and harassment prevention policies and related procedures.
- Report all incidents or injuries of violence/harassment or threats of violence to the Designated Recipient immediately. Complete the Workplace Incident Report.
- Inform your supervisor or the Designated Recipient about your concerns regarding the potential for violence/harassment in the workplace.
- Contribute to risk assessments.
- Seek support when confronted with violence/harassment or threats of violence.
- Get medical attention if required.
- At least once a year, participate in a review of the workplace violence and harassment prevention program.

## Health & Safety Rep [Applicable Partner]

- Ensure you are consulted about the development, establishment and implementation of violence prevention measures and procedures (the violence and harassment prevention program).
- Make recommendations to the employer for developing, establishing, and providing training in violence prevention measures and procedures.
- At least once a year, take part in a review of the workplace violence and harassment prevention program.

## Accountability

All workplace parties are accountable for complying with the policy, program, measures, and procedures related to workplace harassment and violence.

## Education

New employees will receive both general and site-specific orientation to the workplace violence and harassment prevention program within three months after the day on which their employment begins. In addition, all employees will receive an annual review of the program's general and site-specific components. Any new training developed, established, and provided will be done in consultation with, and in consideration of, the recommendations of the Applicable Partner.

## Reporting and Investigation of Workplace Harassment and/or Violence Related Incidents

### 1. How to Report Workplace Harassment or Violence

Workers are required to report all complaints of workplace harassment and/or violence related incidents verbally or in writing to the Designated Recipient; alternatively, reports may be made to the HR department [third party Designated Recipient]. Notice must contain the name of the Principal Party and the Responding Party, if known, the date of the occurrence, and a detailed description of the occurrence.

This report can be made confidentially at the employee's request. However, sharing information to ensure the safety of others and prevent recurrence may be necessary (e.g., contents of police report).

The Principal Party may end the resolution process at any time by informing RDRAA or the Designated Recipient that they choose not to continue with the process.

No report of workplace violence/harassment or risks of violence may be the basis of reprisal against the Principal Party.

## 2. Emergency Response Measures

If the Responding Party is an employee, they must immediately be removed from the workplace and placed on administrative leave pending a determination of the appropriate response to the violent act. The employee's identification and any access keys (if any) should be confiscated to ensure that the person cannot enter the workplace again without the Accountable Executive's permission.

If the Responding Party is a visitor, they will be removed from the premises by management or local law enforcement and will be subject to criminal penalties.

Individuals who witness a violent or harassing act in the workplace should make as many observations as they can about the incident. These observations and any actions taken in response to the act should be documented when safely possible; this documentation should be in writing and dated. Copies of these notes should be given to the Designated Recipient. These notes may provide valuable information and will be useful when proposing or taking corrective or precautionary measures.

Any employee who has obtained an order of protection or restraining order against an individual should notify management and, where possible, provide them with a picture of that individual, in cases where there is a clear threat to workplace safety. The Designated Recipient warns all staff who might be affected about dangerous situations.

If a violent incident results in a critical injury or death to a worker, it must be immediately reported (within 24 hours after becoming aware of) to the Head of Compliance and Enforcement by the Designated Recipient, and an external investigation will ensue.

## 3. Response Procedures

The Designated Recipient will conduct an initial review of every notice of occurrence. Following the initial review, the occurrence will be deemed resolved if the notice does not contain the name of the Principal Party or otherwise allow their identity to be determined.

Within seven days after the day on which notice of an occurrence is provided, the Designated Recipient will contact the Principal Party to inform them:

- a) that their notice has been received or that they have been named/identified as the Principal Party in a notice provided by a witness;
- b) of the manner in which the workplace harassment and violence prevention policy is accessed;
- c) of each step of the resolution process; and,
- d) that they may be represented during the resolution process.

If the notice has been provided by a witness who is not anonymous, the Designated Recipient will contact them within seven days after the day on which the notice is provided, to confirm its receipt.

The Designated Recipient will contact the Responding Party, informing them:

- a) that they have been named or identified as the Responding Party in the notice of an occurrence;

- b) of the manner in which the workplace harassment and violence prevention policy is accessed;
- c) of each step of the resolution process; and,
- d) that they may be represented during the resolution process.

The Designated Recipient, Principal Party, and Responding Party if contacted, must make every reasonable effort to resolve the occurrence, and those efforts must begin no later than 45 days after the day which the notice is provided. If the occurrence is also investigated, it cannot be resolved in this manner after the investigators have provided their report.

Reasonable effort will include a review by the Principal Party and Designated Recipient to determine whether the notice of occurrence describes an action, conduct, or comment that constitutes harassment or violence under the Act. Resolution of the occurrence includes, but is not limited to, a joint determination by both parties that the notice of occurrence provided does not meet the criteria.

The Principal Party and Responding Party may attempt to resolve an occurrence by conciliation if they agree to conciliation and on a person to facilitate it. If the occurrence is also investigated, it cannot be resolved in this manner after the investigators have provided their report.

#### 4. Investigation Process

If an occurrence is not resolved as detailed above, an investigation must be carried out if the Principal Party requests it.

Investigations will be conducted by a third-party investigator (generally a member of the HR department).

- Third party investigators must possess the knowledge, training, and experience required, must not be in a conflict of interest, and must be agreed to by the Designated Recipient, the Principal Party, and the Responding Party.
- If the parties cannot come to an agreement within 60 days after the day on which the notice is provided, an investigator will be selected from among those whom the Canadian Centre for Occupational Health and Safety has identified as having the knowledge, training, and experience.

At a minimum, the following will be completed.

- i. The Designated Recipient must provide the Principal Party and the Responding Party with notice that an investigation is to be carried out.
- ii. The Designated Recipient must provide the investigator(s) with all information relevant to the investigation.
- iii. The investigator must ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation. The investigators should remind the parties of this confidentiality obligation at the beginning of the investigation.



- iv. The investigator must thoroughly interview the Principal Party and the Responding Party if the person in question is a worker of RDRAA. If the Responding Party is not a worker, the investigator should make reasonable efforts to interview the person in question.
- v. The Responding Party must be given the opportunity to respond to the specific allegations raised by the Principal Party. In some circumstances, the Principal Party should be given a reasonable opportunity to reply.
- vi. The investigator must interview any relevant witnesses employed by RDRAA who may be identified by either the Principal Party, the Responding Party, or as necessary to conduct a thorough investigation. The investigator must make reasonable efforts to interview any relevant witnesses who are not employed by RDRAA if there are any identified.
- vii. The investigator must collect and review any relevant documents.
- viii. The investigator must take appropriate notes and statements during interviews with the Principal Party, the Responding Party, and any witnesses.
- ix. The investigator must prepare a written report that includes a general description of the occurrence and summarizes the steps taken during the investigation. The report shall also include their conclusions, including those related to the circumstances in the workplace that contributed to the occurrence and their recommendations to eliminate or minimize the risk of a similar occurrence.
- x. The investigator must ensure that the report does not reveal, directly or indirectly, the identity of persons involved in the occurrence or the resolution process.

#### 5. Results of the Investigation

Within 10 days of the investigation being completed, the Principal Party and the Responding Party, if they are a worker of RDRAA, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by RDRAA to address workplace harassment or violence.

The Designated Recipient and Applicable Partner will also receive a copy of the investigator's report. They must jointly determine which of the recommendations are to be implemented. The Accountable Executive must implement all recommendations jointly agreed upon.

#### 6. Process Completion

Until the resolution process is complete, the Designated Recipient shall provide monthly updates of the status of the process to the Principal Party beginning on the first month after the month in which the notice is provided, and to the Responding Party beginning on the first month after the month in which the Responding Party is first contacted by the Designated Recipient.

The resolution process is completed when the review and any necessary updates of the risk assessments are completed, and recommendations have been implemented. RDRAA must ensure that the resolution is completed within one year after the day on which notice of the occurrence is provided.

If the Principal Party or Responding Party is temporarily absent from work for more than 90 consecutive days after the day on which the notice of the occurrence is provided, the resolution process must be completed within the later of one year after the day on which notice of the occurrence is provided and six months after the day on which the party returns to work.

#### 7. Confidentiality

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment or violence, 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 Principal Party, the Responding Party, and any witnesses should not be permitted to discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. The investigators may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

#### 8. Support for Employees Affected by Workplace Violence or Harassment

Management or designate(s) will respond promptly, assess the situation, and ensure that these interventions are followed.

- Facilitation of medical attention.
- Debriefing (by skilled professional).
- Referrals to community agencies, treating practitioner and employee assistance programs.
- Completion of incident reports, WCB reports, and reporting to the Canada Labour Board.
- Reporting to police authority (as required).
- Staff debriefing.

#### **Former Employees**

A former employee may make a complaint until the day that is the later of:

- a) Three months after the day on which the former employee ceases to be employed by RDRAA, and
- b) If notice of the occurrence was provided three months after the day on which the resolution process is completed in respect of the occurrence.

The Head of Compliance and Enforcement may extend the time period beyond three months if a former employee demonstrates in an application to the Head of Compliance and Enforcement that they were unable to make the occurrence known to RDRAA within the time period because they incurred trauma as a result of the occurrence or because of a health condition.

## Risk Assessments

Management, with the Applicable Partner and worker involvement, assesses workplace violence and harassment hazards in all jobs, and in the workplace as a whole. Risk assessments are reviewed annually, as well as when new jobs are created, job descriptions are changed substantially, in response to incidents, and after every implementation of emergency response procedures.

Risk factors will take into account:

- a) The culture, conditions, activities, and organizational structure of the workplace.
- b) Circumstances external to the workplace, such as family violence.
- c) Any reports, records, and data related to harassment and violence in the workplace.
- d) Physical design of the workplace.
- e) Measures in place to protect psychological health and safety in the workplace.

The following assessments have been completed and reviewed with all staff.

**HARASSMENT**

HARASSMENT		
<p><b>Hazards Identified:</b></p> <ol style="list-style-type: none"> <li>1. Confrontation with: <ul style="list-style-type: none"> <li>• Security breaches</li> <li>• Tenants</li> <li>• General public (e.g., lack of passenger service; noise; teenagers)</li> <li>• Passengers</li> <li>• Pilots</li> <li>• Contractors</li> <li>• Vendors</li> </ul> </li> <li>2. Working events with alcohol present</li> <li>3. Working online (e.g., website; social media; trolling)</li> <li>4. Internal (e.g., staff; management; Board)</li> <li>5. Controversial discussions (history, religion, politics, etc.)</li> </ol>	<p><b>Controls/Mitigation:</b></p> <ol style="list-style-type: none"> <li>1. RCMP could be involved to mitigate if necessary</li> <li>2. Always treat tenants and the public with respect</li> <li>3. Foster good working relationships</li> <li>4. Reporting policy</li> <li>5. Contracted human resources</li> <li>6. Limit working alone</li> <li>7. Contracted social media</li> <li>8. Restrict/cancel access passes</li> <li>9. Avoid controversial discussions and expression of opinions</li> <li>10. Training specific to workplace harassment at the airport.</li> </ol>	<p><b>Safe Work Procedures:</b></p> <ol style="list-style-type: none"> <li>1. Assess the situation; notify someone you are going to proceed with the encounter, and call RCMP or management if necessary.</li> <li>2. Report all incidents, regardless of severity. Harassment of any kind will not be tolerated.</li> <li>3. Use the "buddy" system if there is potential for a negative response to an encounter. If you know someone is not going to take your conversation well, don't go alone.</li> <li>4. Avoid consuming alcohol in public when on duty.</li> <li>5. Work in groups whenever possible.</li> <li>6. Open event spaces (e.g., visibility; better communications)</li> <li>7. Open communication procedures.</li> <li>8. Social media harassment policy implementation.</li> <li>9. Technology <ul style="list-style-type: none"> <li>• Camera installed in truck 25</li> <li>• Phone cameras</li> </ul> </li> </ol>

VIOLENCE		
<p>Hazards Identified:</p> <ol style="list-style-type: none"> <li>1. Working in a high crime area will enable perpetrators to pursue crime; violence usually follows.</li> <li>2. Homeless, addicts, persons out of work, etc. can lead to violent confrontations in otherwise ordinary instances.</li> <li>3. Security breaches</li> <li>4. Angry tenants</li> <li>5. Working with the public (people are watching all the time)</li> <li>6. Work events</li> <li>7. Work where alcohol is present</li> <li>8. Work high stress environments with the public</li> <li>9. Working alone</li> <li>10. Contractors</li> <li>11. Internal               <ul style="list-style-type: none"> <li>• Staff</li> <li>• Third party security personnel</li> </ul> </li> </ol>	<p>Controls/Mitigation:</p> <ol style="list-style-type: none"> <li>1. Situational awareness</li> <li>2. Human Factors training</li> <li>3. Communication training</li> <li>4. Open communication</li> <li>5. Reporting policies</li> <li>6. Avoid consuming alcohol in public when on duty</li> <li>7. Technology               <ul style="list-style-type: none"> <li>• Camera installed in vehicle 25</li> <li>• Phone cameras</li> <li>• Swipe access for office</li> <li>• Cameras for office; shop alarmed and monitored, with panic button and siren</li> </ul> </li> </ol>	<p>Safe Work Procedures:</p> <ol style="list-style-type: none"> <li>1. Do not confront or try to de-escalate violent situations unless it is safe to do so by yourself. RCMP to be called regardless of threat level.</li> <li>2. When confronted with a violent situation, attempt to get help from anyone nearby.</li> <li>3. Avoid working alone situations if violence may be an issue, particularly after hours.</li> <li>4. Use the "buddy" system if there is potential for a violent response to an encounter. If you know someone is not going to take your conversation well, don't go alone.</li> <li>5. Report aggressive behaviors.</li> <li>6. Human Factors training.</li> <li>7. Emergency response practice.</li> </ol>

### Program Evaluation

The effectiveness of the workplace violence and harassment prevention program is evaluated annually by management and the Applicable Partner.

The Designated Recipient reviews all incident reports, monitors trends, and makes recommendations for prevention and enhancements to the workplace violence and harassment prevention program. Management must ensure appropriate actions are taken to eliminate or minimize the chance of similar incidents.

These findings (**but not reports or identifying information**) are shared with the Applicable Partner, who is consulted about any revision to the violence and harassment prevention and training program.

The assessments will be updated to reflect changes to the information set out, including:

- a) A change to the risk factors, and
- b) A change that comprises the effectiveness of any preventive measures developed and implemented.

If RDRAA and the Applicable Partner are unable to agree on any matter that is required by Regulations to be done jointly, the employer's decision shall prevail.

### Records

All records are kept for a minimum of (but not limited to) ten years. Records include, but are not limited to:

- This policy
- Documents that form part of the risk assessments
- Documents that form part of each review and update
- A record of RDRAA's decision and reasons for that decision for each instance where the Designated Recipient and Applicable Partner are unable to agree on matters that must be done jointly.
- A record of each notice of occurrence and each action taken in response to the notice
- Documents setting out the reason for any delay where a time limit is not met
- Each report that is prepared by an investigator
- Each annual report
- Copies of any fatality reports

### Policy Review

This workplace violence and harassment prevention policy and program will be reviewed annually at a minimum, and in response to an incident.

January 4, 2024



Graham Ingham  
CEO/Accountable Executive