



POLICY ON PREVENTING AND MANAGING SITUATIONS OF HARASSMENT, INCIVILITY, AND VIOLENCE IN THE WORKPLACE

TO MAINTAIN A HEALTHY AND SAFE WORKPLACE FOR EVERYONE

March 9th, 2026

1. OBJECTIVES OF THE POLICY

This policy aims to:

- ✓ Establish the procedure for managing situations involving harassment, incivility, or violence in the workplace;
- ✓ Clarify the roles and responsibilities of members of the organization;
- ✓ Provide appropriate support, to the extent possible, to victims of harassment, incivility, or workplace violence;
- ✓ Develop an organizational culture grounded in respect;
- ✓ Contribute to accountability, awareness, information sharing, and training within the organization.

2. SCOPE OF APPLICATION

This policy governs the relationships between coworkers, between supervisors, between managers and subordinates, between employees and citizens, between employees and elected officials, between employees and suppliers, and between employees and any other third party.

This policy applies to conduct occurring within the scope of work. Such conduct may occur at the workplace – including teleworking locations – during training sessions, meetings, or travel, at work-related social events (e.g., Christmas party, team lunch), or through communications transmitted via technological means (e.g., social media, Zoom, Microsoft Teams).

3. DEFINITIONS

Employee:

A person who performs work under the employer's direction or control. For the purposes of this policy, interns and volunteers are considered employees.

Employer:

Township of Wentworth

Management Rights:

The employer's right to direct employees and its organization to ensure proper operation and profitability. Examples include monitoring work performance, absenteeism, task assignment, or the application of disciplinary or administrative processes.

Harassment must not be confused with the legitimate exercise of the employer's authority, provided such authority is not exercised in a discriminatory or abusive manner.

Harassment:

Any form of harassment, including but not limited to psychological harassment, sexual harassment, harassment based on a protected ground under human rights charters, administrative harassment (abuse of power), and cyberharassment.

Psychological Harassment:

Psychological harassment is vexatious conduct manifested through repeated words, acts, behaviors, or gestures that are hostile or unwanted, and that undermine a person's dignity or physical or psychological integrity or create adverse working conditions that make the workplace harmful. A single serious act with a lasting harmful effect may also constitute harassment.

Examples of behaviors that may constitute harassment include:

- ✓ A person intimidating another employee;
- ✓ Damaging an employee's property;
- ✓ Making disparaging remarks about an employee;
- ✓ Completely ceasing to speak to an employee.

Sexual Harassment:

Sexual harassment is characterized by words, acts, behaviors, or gestures that are sexual in nature or have a sexual connotation. It may include:

- ✓ Unwelcome advances, requests for favors, invitations, or solicitations of a sexual nature;
- ✓ Sexual comments, remarks about someone's body or appearance, or jokes that demean sexual identity or sexual orientation;
- ✓ Unwanted physical contact such as touching, pinching, grabbing, or intentional brushing;
- ✓ Threats, retaliation, or any other unfair treatment associated with sexual favors.

Incivility:

Conduct that violates the obligation of mutual respect inherent in workplace relationship.

Interim Measures:

Measures implemented by the employer upon receiving a harassment complaint and throughout its processing to limit contact between the complainant and the respondent, thereby preserving a healthy work environment.

Respondent:

The person alleged to have engaged in harassing, uncivil, or violent conduct and who is the subject of a complaint. This may be an employee (including a supervisor or general management), an elected official, a supplier, a citizen, or a third party.

Complainant:

The person who believes they are a victim of harassment, incivility, or violence in the workplace. This refers to an employee, including supervisors and general management.

Complaint:

An action by which the complainant informs the employer of a potential situation of harassment, incivility, or violence in the workplace. To simplify the policy wording, the term "complaint" includes "report".

Policy:

This *"Policy on Preventing and Managing Situations of Harassment, Incivility, and Violence in the Workplace"*.

Report:

An action by which a person other than the complainant informs the employer of a potential situation of harassment, incivility, or violence in the workplace involving an employee.

Immediate Supervisor:

The manager representing the first level of authority above an employee and who exercises direct control over that employee's work.

Workplace Violence:

Any action, incident, or behavior that deviates from reasonable conduct in which an employee is attacked, threatened, harmed, or injured in the course of or in connection with their work. This includes any situation of physical or psychological violence, including domestic, family, or sexual violence, when the employee is exposed to it in the workplace.

4. ROLES AND RESPONSABILITIES

All individuals covered by this policy must adopt free of harassment, incivility, or violence. This includes, among other things, maintaining professional behavior during work-related social events, which specifically implies moderate alcohol consumption when permitted by the employer.

All individuals covered by this policy must also contribute to establishing and maintaining a healthy work environment, notably by reporting to the employer any situation involving harassment, incivility, or violence in the workplace.

4.1 Municipal Council:

- a) Supports general management in applying this policy;
- b) Processes any complaint in accordance with the provisions of the policy;
- c) Respects confidentiality throughout the entire process.

4.2 General Management:

- a) Is responsible for implementing the policy;
- b) Processes any complaint in accordance with the provisions of the policy;
- c) Informs the Council of the existence of a complaint or an intervention of interest, using appropriate measures to protect confidentiality;
- d) Ensures the dissemination of the policy and raises employee awareness;
- e) Handles any complaint by initiating the informal resolution mechanism;
- f) Facilitates conflict resolution and collaborates with various parties involved;

4.3 Employee

- a) Reviews and acknowledges the policy;
- b) Collaborates with resolution mechanisms, when required.

4.4 Complainant

- a) When possible, reports any situation of harassment, incivility, or violence to the potential respondent in order to request that such behavior cease, and does so as promptly as possible;
- b) Reports the situation to an immediate supervisor if the alleged harassment, incivility, or violence continues;
- c) Collaborates in all resolution mechanisms.

4.5 Respondent

- a) Collaborates in all resolution mechanisms.

5. RULES COMMON TO ALL COMPLAINT HANDLING MECHANISMS

- a) Every complaint is handled with respect, diligence, fairness, discretion, and impartiality, using the mechanism deemed appropriate;
- b) An external party may be mandated by the employer to carry out, in whole or in part, any of the complaint resolution mechanisms. In such cases, the policy shall be interpreted with the necessary adaptations;
- c) The mechanisms set out in this policy do not prevent an individual from exercising the rights granted to them by law within the applicable statutory time limits.

6. INFORMAL COMPLAINT RESOLUTION MECHANISM

- a) The informal resolution mechanism aims to avoid unnecessarily disrupting the workplace and to involve both the complainant and the respondent in seeking informal solutions to resolve the situation. The parties may use this mechanism at any time during the processing of a complaint;

- b) The complainant informs their immediate supervisor (or general management if the immediate supervisor is the one involved) of the conflict and is informed of the options available to resolve it;
If the conflict involves general management, or if a complaint is filed by general management, it must be reported to the Mayor;
- c) The person handling the complaint must verify whether the parties are willing to begin an informal resolution mechanism;
- d) If the parties wish to participate in the informal resolution mechanism, the person handling the complaint must:
 - ✓ Obtain each party's version of the facts;
 - ✓ Encourage discussion and suggest possible solutions to help resolve the conflict;
 - ✓ Identify, together with the parties, the solutions agreed upon to resolve the conflict.
- e) If the mechanism fails or if either party does not wish to participate, the complainant is informed of the option to proceed with the applicable formal complaint-handling mechanism. General management is also informed of the situation and may then decide to conduct an investigation and determine any applicable measures, if necessary.

7. FORMAL MECHANISM FOR HANDLING A HARASSMENT COMPLAINT

- a) This mechanism does not apply to complaints of incivility or violence in the workplace unless such conduct qualifies as harassment;
- b) The complainant may file a complaint with general management no later than two (2) years following the last occurrence of a harassing act.
If the complaint concerns general management or is filed by general management, it is submitted directly to the Mayor;
- c) A complaint may be made verbally or in writing. Incident details must be described as precisely as possible, indicating, when available, the dates, locations, and names of witnesses, if any. A complaint form identifying the required information for processing is attached as an Annex.

7.1 Investigation

- a) Upon receiving a complaint, general management must:
 - ✓ Provide the complainant with written acknowledgment of receipt;
 - ✓ Establish temporary measures, when required;
 - ✓ Verify, in a preliminary manner, what has already been attempted to resolve the situation;
 - ✓ Carry out steps to determine the admissibility of the complaint and provide follow-up to the complainant regarding the decision.

- b) If the complaint is deemed admissible, general management reviews all facts and circumstances related to the allegations provided by the complainant;
- c) General management must first inform the respondent that an investigation will take place. A written notice of meeting is then sent, at least forty-eight (48) hours before the meeting, to obtain the respondent's version of events. This notice outlines the main éléments of the complaint;
- d) The investigation includes meeting with the parties involved in the complaint as well as any relevant witnesses. During these meetings, the complainant and the respondent may be accompanied by a person of their choice who is not involved in the complaint. All individuals must sign a confidentiality agreement. An accompanying person cannot serve as a witness.

7.2 Investigation Findings

- a) General management prepares a written report concluding whether or not harassment occurred. It may then:
 - ✓ Meet with the Municipal Council to inform them whether the complaint is substantiated and present recommendations, if applicable;
 - ✓ Meet individually with the complainant and the respondent to inform them whether the complaint is substantiated.
- b) Following the investigation, the employer may:
 - ✓ Intervene in the workplace to stop the harassment;
 - ✓ Impose sanctions;
 - ✓ Establish special arrangements when the complaint concerns an Elected Official, a citizen, a volunteer, or a supplier;
 - ✓ Refer the parties involved to an employee assistance program or any other professional resource.
- c) A complaint may be withdrawn at any time in writing. Despite the withdrawal, the employer reserves the right to continue the investigation if it deems it necessary;
- d) Measures may also be implemented to maintain or promote a healthy work environment even if no allegation of harassment is substantiated.

8. FORMAL MECHANISM FOR HANDLING AN INCIVILITY OR A VIOLENCE COMPLAINT

- a) A complaint may be filed with general management no later than thirty (30) days following the last occurrence of an uncivil or violent act in the workplace. If the complaint concerns general management or is filed by general management, it is submitted directly to the Mayor;

- b) A complaint may be made verbally or in writing. Incident details must be described as precisely as possible, indicating, when available, the dates, locations, and names of witnesses, if any. A complaint form identifying the information required for processing is attached as an Annex;
- c) In the event of refusal or failure of the informal resolution mechanism, and where allegations of incivility or violence are present, general management conducts an investigation in accordance with generally applicable rules and determines appropriate measures, if necessary.
When an Elected Official is the subject of the complaint, it is the responsibility of the Municipal Council to determine the appropriate process for handling the matter;
- d) This mechanism also applies when a supplier, citizen, third party, or volunteer is the subject of such a complaint. In such cases, the employer determines the applicable sanctions or special arrangements, if necessary.

9. SANCTIONS

- a) An employee, including a supervisor or general management, who does not comply with this policy is subject to administrative or disciplinary measures depending, among other factors, on the seriousness of the actions, which may include dismissal;
- b) An Elected Official, citizen, volunteer, supplier, or third party who does not comply with the policy is subject to administrative or legal measures.

10. CONFIDENTIALITY

The employer respects the right to confidentiality regarding personal information related to the application of this policy. All complaints are handled discreetly, and confidentiality is required from all individuals involved in a complaint or in its processing. Subject to what is necessary for the application of the policy, the employer acknowledges that all information will remain confidential.

All resolution mechanisms and investigation reports are confidential.

If an investigation reveals the presence of harassment or workplace violence, all documents related to the handling and processing of the complaint – including material evidence and the investigation report – are kept for a minimum of two (2) years and then destroyed once the employment of both the respondent and the complainant has ended, and in accordance with applicable rules.

In cases of an investigation involving incivility, or when an investigation does not establish that harassment or violence occurred in the workplace, all material evidence and the investigation report are kept for at least two (2) years following the conclusion of the investigation and then destroyed in accordance with applicable rules.

11. GOOD FAITH

- a) The good faith of the parties is essential to resolving any situation. Seeking the best possible solution, with the collaboration of all parties, is preferred in order to achieve a faire and equitable resolution for everyone;
- b) Any person to whom this policy applies who refuses to participate in the investigation under the formal resolution mechanism is subject to a sanction;
- c) Any person who files a complaint deemed malicious, frivolous, or made in bad faith is subject to a sanction.

12. REPRISALS

No person may suffer any form of harm or reprisal for using the mechanisms provided under this policy or for having participated in any of the mechanisms.

Any person who engages in reprisals is subject to sanctions.

13. REVIEW AND AWARENESS

The policy will be reviewed periodically or as needed. A copy of the policy is provided to every new Elected Official and employee, including supervisors and general management.

A copy is placed in their file.

I acknowledge that I have read and understood the terms of the policy and accept its conditions.

Signature of the employee or Elected Official

Date

ANNEX 1 WORKPLACE CIVILITY CODE

The Workplace Civility Code of the Municipality of the Township of Wentworth serves as a reference to guide interpersonal relationships in the workplace. It represents a commitment by each individual to demonstrate courtesy and respect in order to promote a respectful, harmonious, and healthy work environment for all.

Objectives

- Encourage individual and collective reflection on how to treat members of the municipal team and on the impact that each person's attitude and behavior can have on others.
- Raise awareness among all municipal team members regarding the importance of maintaining relationships grounded in civility.
- Establish a culture of respect, civility, and courtesy.
- Prevent conflicts by fostering a culture of respect, civility, and courtesy.

"Civility is behavior characterized by mutual respect, which includes, among other things, listening, collaboration, politeness, and courtesy."

Team Values

In addition to the values set out in the Codes of Ethics and Conduct of the Municipality of the Township of Wentworth, the Municipal Team commits to respecting the following values:

Respect Work in a healthy environment characterized by respect and collaboration.	Listening Pay attention to what others say in order to encourage constructive dialogue.
Civility Communicate with politeness, courtesy, and good manners, at appropriate times and in appropriate places.	Empathy Understand others' ideas and points of view, even when they differ from your own.
Collaboration Collaborate by demonstrating teamwork, commitment, and support.	Openness Be open to the ideas and opinions of others.

Commitments

- Act in accordance with the values outlined in this guide.
- Pay particular attention to one's own behavior in order to demonstrate civility at all times.
- Not tolerate any situation involving incivility.

ANNEX 2

Annexe 2 – Formulaire de plainte

FORMULAIRE DE PLAINTE		
INFORMATIONS SUR LE PLAIGNANT		
Nom :	Prénom :	
Emploi/fonction :	ID :	
Service :		
Adresse :		
INFORMATIONS SUR LE OU LES MIS EN CAUSE		
Nom :	Prénom :	
Emploi/fonction :		
Service :		
Nom :	Prénom :	
Emploi/fonction :		
Service :		
DESCRIPTION DU LIEN AVEC LE OU LES MIS EN CAUSE		
☐ Supérieur immédiat	☐ Citoyen	☐ Collègue de travail
☐ Subordonné/employé	☐ Élu municipal	☐ Fournisseur
☐ Membre de la direction	☐ Autres :	
INFORMATIONS SUR LE OU LES TÉMOINS		
Nom :	Prénom :	
Emploi/fonction :		
Nom :	Prénom :	
Emploi/fonction :		
Nom :	Prénom :	
Emploi/fonction :		

DESCRIPTION DES ÉVÉNEMENTS (*Rappel : Les détails des incidents doivent être décrits avec autant de précision que possible en indiquant, en autant que faire se peut, les dates, les endroits et le nom des personnes témoins, le cas échéant.*)

This image shows a single page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.**EXACTITUDE DES INFORMATIONS :**

J'atteste que les informations fournies sont exactes et je suis conscient(e) que les fausses allégations sont passibles de sanctions.

Signature :

Date : _____
AAAA-MM-JJ