



## ANTI-DISCRIMINATION AND HARASSMENT PREVENTION POLICY

The core objective of the Strength in Me program is to advance inclusivity, diversity, and accessibility in sports while nurturing a holistic approach to physical and mental well-being. Our utmost commitment lies in establishing an environment that upholds respect and is devoid of discrimination and harassment.

To accomplish this, Strength in Me will undertake all essential actions, which include:

1. Establishing and maintaining a supportive and safe environment for all staff, volunteers, and participants.
2. Preventing workplace discrimination and harassment by raising awareness about the rights and responsibilities of volunteers.
3. Promptly identifying and addressing any instances of discrimination or harassment.

It is important to note that despite Strength in Me's unwavering commitment to this policy, individuals who encounter instances of discrimination or harassment still retain the right to seek assistance from the **Human Rights Tribunal of Ontario**. This right remains unaffected even if actions are being taken in accordance with our policy.

### Purpose and Scope:

The objective of this policy is to offer concise and explicit instructions to all staff and volunteers associated with the Strength in Me program. These guidelines aim to ensure compliance with legal obligations concerning human rights, health, and safety, particularly in relation to discrimination and harassment. Additionally, the policy is designed to aid staff and volunteers in comprehending their responsibilities in fostering an environment that is devoid of discrimination and harassment.

This policy is applicable to all staff and volunteers affiliated with the Strength in Me program. It is highly encouraged to report any occurrences of discrimination and harassment, irrespective of the identity of the individual responsible. It is important to note that this policy extends to instances of harassment that may transpire during any Strength in Me-related business, activities, or events.

### Definitions

In the context of this policy, discrimination is defined as any practice or behavior, regardless of intent, that adversely affects an individual or group based on one or more prohibited grounds outlined in the relevant legislation of Ontario. Discrimination can occur through unequal treatment or when the same treatment disproportionately impacts individuals or groups protected from discrimination under existing laws.

Discrimination is strictly prohibited based on various grounds, including race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex (including pregnancy and gender identity), sexual orientation, age, record of offenses, marital status, family status, and disability. Strength in Me firmly opposes all forms of discrimination and adopts a zero-tolerance stance towards any behavior that is considered discriminatory. Our policy outlines a comprehensive complaint and investigative process to address such incidents.



**Guidance Comment:** Strength in Me requires all staff and volunteers who are 18 years of age or older to submit a background check report from the Toronto Police Services (TPS). If the background check reveals any criminal convictions or legal restrictions that prohibit contact with youths or vulnerable individuals, Strength in Me retains the right to prohibit the individual from participating or being present in our program.

**Reason:** Strength in Me is dedicated to exercising thorough care and precautionary measures to minimize the likelihood of parents raising concerns or initiating legal proceedings due to their children having direct contact with individuals who have been convicted of crimes. Any individual with court-ordered restrictions that limit their interaction with youths or vulnerable individuals may be prohibited from participating in the Strength in Me program or events, depending on the specific nature of those restrictions.

**Guidance Comment:** If an individual who applies to Strength in Me is determined by the Board of Directors and the Executive Director to be mentally or physically incapable of fulfilling regular volunteer duties, Strength in Me retains the authority to restrict or prohibit their involvement in events or their presence on such occasions.

**Reason:** Strength in Me is a not-for-profit organization operating with limited resources and a multitude of overlapping responsibilities. If an individual has physical or cognitive limitations that cannot be accommodated through modified duties, their participation may be restricted at the discretion of Strength in Me.

In accordance with this policy, **harassment** is defined as engaging in a repetitive pattern of comments or behavior that is vexatious and known or should reasonably be known to be unwelcome. Harassment can take various forms, including but not limited to:

- written or verbal abuse, as well as threats.
- displaying offensive visual material or material that one should know is offensive.
- making unwelcome remarks, jokes, comments, innuendos, or taunting based on a person's appearance, body, attire, age, race, religion, sex, or sexual orientation.
- engaging in leering or other suggestive or obscene gestures.
- behaving in a condescending or patronizing manner that undermines self-esteem, diminishes performance, or negatively affects the working or volunteer environment.
- playing practical jokes that cause awkwardness, embarrassment, jeopardize safety, or negatively impact performance.
- initiating unwanted physical contact, such as touching, petting, pinching, or kissing.
- making unwelcome sexual flirtations, advances, requests, or invitations.
- committing physical or sexual assault.

These behaviors are considered forms of harassment as per this policy.



## **Principles**

Discrimination or harassment will not be tolerated in any aspect of Strength in Me's operations, activities, and events. Every representative and volunteer of Strength in Me has the right to participate in an inclusive and respectful environment that is free from discrimination and harassment. It is the responsibility of every representative and volunteer to treat others with dignity during any Strength in Me business, activities, and events.

Preventing discrimination and harassment is an integral part of all Strength in Me's operations and activities. It is a collective responsibility that requires cooperation between the Board of Directors, representatives, and volunteers. All allegations of discrimination and harassment are taken seriously and handled confidentially in accordance with this policy and applicable laws. The aim is to preserve the dignity, self-respect, and rights of all parties involved.

Responses to instances of discrimination and harassment will be prompt, considerate of all relevant factors, and will hold accountable those who do not adhere to this policy.

## **Policy Violations**

Policy violations may include, but are not limited to, the following:

- engaging in activities that could be seen as hateful, violent, or in violation of applicable laws.
- behaving in ways that are described in the Definitions section of this policy.
- making false or frivolous complaints, allegations, or accusations.
- interfering with an investigation by intimidating complainants, respondents, or witnesses, or influencing someone to provide false or misleading information.
- threatening or retaliating against individuals who exercise their rights under this policy or against those who have legitimate roles under this policy.
- and if the leadership of Strength in Me fails to appropriately respond to information about discrimination or harassment, it will be considered a violation of this policy.

## **Accountability**

During and after the investigation of alleged policy violations, it is important for all parties involved to maintain strict confidentiality, unless required by law to share information.

Strength in Me is committed to not disclosing the complainant's name, the circumstances of the complaint, the respondent's name to external parties, unless legally obligated to do so.



The Executive Director and Board of Directors of Strength in Me have the following responsibilities:

- implementing this policy, reviewing it annually and updating it as needed to align with Strength in Me's objectives and applicable laws,
- ensuring that the policy is accessible to all staff and volunteers on the organization's website,
- complying with the obligations outlined in the policy,
- discouraging and preventing any activities that contradict the policy,
- investigating claims made under this policy and exploring options for timely and effective resolution,
- acting in a neutral and unbiased manner to receive, investigate, and assist in resolving complaints informally or formally,
- taking appropriate action to resolve complaints within the specified timeframes, and
- refraining from threatening, intimidating, or retaliating against individuals who exercise their rights under this policy or associated legislation.

Strength in Me representatives who oversee events, activities, and staff and volunteers have the following responsibilities:

- adhering to the obligations stated in this policy.
- discouraging and preventing any activities that contradict this policy to the best of their ability.
- promptly escalating complaints or reporting witnessed incidents to the Board of Directors.
- following the outlined protocols for filing complaints as specified in this policy, utilizing the Discrimination and Harassment Prevention Policy Complaint form.
- fully cooperating in the investigation of discrimination or harassment allegations.
- ensuring that their own behavior does not pose a threat, intimidate, or retaliate against any individual who exercises their rights under this policy or associated legislation.

Complainants, respondents, and witnesses are encouraged to fully cooperate in the process and will have access to their own statements and personal information provided to the Board of Directors.

It is the responsibility of every member of Strength in Me to ensure that all activities and events are free from discrimination and harassment. This means refraining from engaging in, allowing, condoning, or ignoring behavior that goes against this policy.

Any member who believes that another member has experienced or is currently experiencing discrimination or harassment during Strength in Me events or activities must promptly notify a member of the Board of Directors or the Executive Director as outlined in this policy. If a member of the Board of Directors is involved in a complaint made under this policy, the Executive Director of Strength in Me will appoint a suitable alternate to handle the complaint.



## **Consequences for Policy Violations**

Members of Strength in Me, including representatives, staff, or volunteers, who violate this policy may face temporary suspension from their duties or permanent removal of their role.

Members of Strength in Me may be prohibited from participating in any Strength in Me business, events, or activities during the investigation process or indefinitely, as determined by the Board of Directors and the Executive Director.

All complaints will be carefully reviewed on an individual basis. If it is determined that the allegations of discrimination or harassment are false, vexatious, retaliatory, or unfounded, Strength in Me reserves the right to remove the complainant from their duties as a member of the organization and potentially ban them from future activities or events.

## **Timeframes**

Efficient and cooperative action is expected from all parties involved in addressing discrimination or harassment issues or complaints. It is important to promptly address and resolve these matters. Any complaints related to this policy must be submitted within six months of the alleged incident.

## **Complaint Procedure**

Strength in Me representatives and volunteers are encouraged, whenever feasible, to communicate with alleged offenders regarding unwelcome conduct or actions that may be perceived as discriminatory or harassing, and to request that the alleged offender cease such behavior.

- If feasible, witnesses to such unwelcome behavior are encouraged to engage with the alleged offender(s) and discuss the unwelcome conduct or actions that are perceived as harassing, urging them to cease such behavior.
- If any representatives or volunteers of Strength in Me experience or witness behavior that goes against this policy, it is strongly encouraged to immediately inform the Strength in Me representative in charge of the activity or event, or a member of the Strength in Me Board of Directors.

The overseeing representative is obligated to document the events in writing and advise the complainant to review this policy and submit a written complaint using the provided Discrimination and Harassment Prevention Policy Complaint form.

When filing a complaint, it is important for complainants to provide sufficient information to facilitate an initial assessment. Complaints lacking sufficient information will be evaluated based on the available details.

When informed about any behavior that violates or may violate this policy, whether reported by a Strength in Me event or activity leader or directly by the complainant, the Board of Directors will gather to examine and discuss the written complaint. Subsequently, they will designate a lead to carry out a comprehensive investigation into the issue.

The designated lead will contact the complainant by e-mail and by telephone to notify them about their entitlement to have a support person (or legal guardian, if underage) present during any discussions. A meeting will be arranged with the complainant, either in-person or through a virtual meeting, to:

- Discuss the matter and gather additional details regarding the date, time, and location of the alleged conduct.
- If necessary, identify potential witnesses and collect their contact information for potential further information.



- Inform the complainant about their option to file a formal, written complaint if an informal resolution is not suitable.
- Provide guidance on the confidentiality provisions outlined in this policy.
- Explain the right to withdraw from any further action related to the complaint at any stage.
- If appropriate, direct the complainant to contact the police immediately.

The designated lead assigned to the case will reach out to the respondent to inform them about the allegations and gather additional information. They will provide the respondent with an opportunity to respond to the allegations. If necessary, the lead will also contact any named witnesses.

The designated lead will prepare a confidential written summary of findings and recommendation(s) to be presented to the Executive Director and Board of Directors for review and determination of next steps. The recommendations may include:

- No further action to be taken if the complaint is found to be unfounded or the conduct does not fall within the policy's definition of harassment.
- Further investigation of the complaint, which may involve seeking assistance from an external party such as the police.
- Any other appropriate resolution recommended by the designated lead.

Upon request, a copy of the report without preliminary recommendations will be provided to both the complainant and respondent.

The Names of individuals involved will not be disclosed on the report, referring to the complainant as "the Complainant," the respondent as "the Respondent," and any witnesses as "Witness 1," "Witness 2," etc.

If a formal investigation is required, the designated lead will complete a thorough review within 5 days of concluding the investigation.

In cases where an extension is necessary, the designated lead will inform the Board of Directors, the complainant, and the respondent in writing about the delay and provide an estimated timeline for completion.

It is crucial to emphasize that the designated lead will be an impartial individual who does not have any personal or professional connection with either the complainant or the respondent. In situations where the complainant identifies as female, efforts will be made to assign a female lead to investigate the allegation. If the complainant identifies as male, a male lead will be appointed to investigate the allegation. This aligns with Strength in Me's dedication to fairness and sensitivity.