



WorkplaceNL Harassment Prevention Guide

WorkplaceNL

Health | Safety | Compensation

Preventing Workplace

HARASSMENT

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Introduction

Workplace harassment means inappropriate, vexatious conduct or comment by a person to a worker that the person knew or ought to have known would cause the worker to be humiliated, offended or intimidated.

It can take place at work or in a situation connected to work; can happen repeatedly or only once; be intended or unintended; and can be written, verbal, physical, a gesture or display, or any combination of these. It can include electronic messages to a person or social media posts.

Examples of harassing behaviour may include:

- Unwelcome conduct, comments, gestures or contact which causes offense or humiliation
- Misusing power or authority
- Referring to a person using terms or pronouns that do not align with the person's affirmed gender
- Physical or psychological bullying which creates fear or mistrust, or which ridicules or devalues the individual
- Excluding, intimidating or isolating individuals
- Making inappropriate gestures/comments
- Making inappropriate sexual advances
- Discriminating based on gender
- Cyberbullying such as posting offensive or intimidating messages through social media or email
- Deliberately setting the individual up to fail

Reasonable and fair actions taken by an employer or supervisor, in a respectful manner, to manage and direct workers is NOT harassment. Examples of this include:

- Changing work assignments
- Scheduling, assessing and evaluating work performance
- Inspecting workplaces
- Implementing health and safety measures
- Taking disciplinary action, such as dismissing, suspending, demoting, or reprimanding with just cause

Section 22 – 24.2 of the Newfoundland and Labrador OHS Regulations requires every workplace to have a harassment prevention plan.

Harassment Prevention Plan

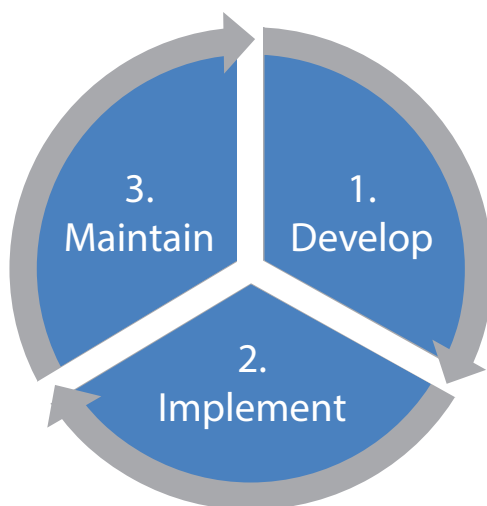
Employers must develop, implement and maintain a workplace harassment prevention plan (HPP) in consultation with the occupational health and safety committee, worker health and safety representative or workplace health and safety designate.

The HPP should state the commitment and obligations of the employer, supervisor and workers and outline the process and procedures for dealing with a harassment complaint. These procedures include:

- Reporting instances of complaints
- Investigating complaints
- Notifying those involved of the results of investigations and any actions taken

The following guide will help you develop, implement and maintain a workplace HPP. As every workplace is unique, plans will vary.

Harassment Prevention Plan Process



1. Develop a Harassment Prevention Plan

Start with the law

This section should include the definition of harassment and a brief overview of sections 22 – 24.2 of the OHS Regulations.

Include the statement that every worker is entitled to a harassment-free workplace

Include statements of employer's commitment

- The employer is committed to eliminating, where possible, or otherwise minimizing, the hazard of workplace harassment.

Include a statement of supervisor's obligations

- The supervisor is obligated to ensure the health and safety of workers, as well as apply and comply with the harassment prevention plan.

Include a statement of worker's obligations

- Workers are obligated to take reasonable care to not engage in bullying or workplace harassment, report observations or experiences of bullying and workplace harassment and comply with the harassment prevention plan.

Include a statement of confidentiality and worker's rights under various laws

- Any information obtained relating to a claim of workplace harassment, including personal information, will not be disclosed unless it is necessary for the purpose of an investigation, corrective action relating to the complaint or where required by law.
- The employer's harassment prevention plan is not intended to discourage a worker from exercising his or her rights under the Human Rights Act, 2010, the Criminal Code (Canada) or any other law of the province or of Canada.

Include a statement of protection and support

- The employer shall protect workers from retaliation and provide support to workers when workplace harassment occurs.

Write reporting procedures for making a complaint

Workers who believe they are being harassed need to know what to do when making a complaint. This can be a stressful time and having clear and simple directions to follow will help to reduce the stress they are feeling. Procedures must be developed for reporting complaints of harassment to the employer. The employer should identify the specific person(s) or department within the organization that receives complaints of harassment. An external third party must be identified when the alleged harasser is the employer or supervisor. Timelines for reporting should be outlined (i.e. report as soon as possible). It is recommended that incidents of harassment are reported as soon as possible, but no later than 12 months after the most recent incident.

Complaints of harassment may also be dealt with on an informal basis between the complainant and the alleged harasser, if they feel it is safe to do so. They may also choose to have their manager/supervisor approach the alleged harasser to notify them that their behaviour is unwelcome.

A Workplace Harassment Report Form should be developed to ensure all relevant information is collected (See page 10 for a sample).

Write procedures to investigate a complaint

When there is an incident or complaint of workplace harassment, the employer must ensure that an investigation appropriate in the circumstances is conducted. The investigation begins once a report of harassment has been received by the employer or supervisor, or the external third party if the alleged harasser is the employer or supervisor. (See page 12 for guidelines).

An investigation procedure outlines:

- The purpose of the investigation and how it will be investigated
- The person who conducts the investigation
- The information that is collected, including:
 - o Names
 - o Date of the complaint
 - o Details of the incident(s)
 - o Names of witnesses and information gathered from them
 - o Notes from interviews and meetings
 - o Associated documents or evidence
 - o Actions taken as a result of the incident or complaint and investigation

The procedure should also reference:

- Confidentiality requirement in accordance with the legislation
- The involvement of an impartial third party when ordered by OHS Officer
- Timelines for completion are determined by the employer and outlined in the Harassment Prevention Plan
- Where the outlined timeline cannot be met, reasons for the delay and the projected new date of completion must be documented for the file
- Bargaining unit employees should consult with the collective agreements for further direction, when required
- Timelines for responding to a harassment complaint



Timeline Example:

- When a complaint is received by the supervisor or the external third party, a meeting will be scheduled with the complainant within five days to begin the investigation process.
- Interviews with the complainant, the alleged harasser and any witnesses will be conducted to confirm the details of the alleged harassment within 15 days.
- Investigation report will be available within 90 days to the complainant and the alleged harasser.
- Both parties will have 14 days to respond to the report. After this time period has expired, corrective actions may be taken.

Write procedures for notification

When the investigation is finished, write a report detailing the findings of the investigation and notify the individuals involved. The report must state whether the complainant's allegations were confirmed or not.

The content of the report should include the:

- Names of persons who conducted the investigation, other persons involved and interviewed
- Date, time and place of the alleged harassment
- Description of the alleged harassment
- Graphics, photographs or evidence, if relevant

- Findings of the investigation, including the facts and reasons for determining if harassment took place or not
- Immediate and long-term corrective action to be taken
- Reasons why no corrective action will be taken where none will be taken

The employer must meet separately with the complainant and the alleged harasser to explain the conclusions in the report, along with any disciplinary action to be taken or other steps that will be put in place to stop a repeat of the offensive conduct.

Outline corrective actions for harassers

If a complaint of harassment has been confirmed, there must be recourse for the individual(s) who have been found to have committed an act of workplace harassment.

Examples of corrective actions include, but are not limited to:

- Education and training in:
 - o Conflict resolution
 - o Assertiveness
 - o Internal HPP and procedures
 - o Respectful workplace
- Reprimand
- Suspension
- Termination

Any corrective action taken would have to be done in accordance with the disciplinary procedures of the organization.

Online support for workers

This may include: EAP, debriefing, peer-to-peer support.

Outline requirements for documentation and record keeping

The employer must maintain accurate records of the information collected relating to harassment reports and investigations. This information should be kept in a secure location and access limited to the person responsible for managing complaints of harassment. This will vary depending on the structure of the organization.

An external third party provider engaged in the investigation process must maintain confidentiality and follow documentation and record keeping practices of the employer, on behalf of the employer.

If the investigation does not find evidence to support the complaint, no record of the complaint, investigation or decision will go in the complainant's personnel file if the complaint was made in good faith.

2. Implement a Harassment Prevention Plan (HPP)

Implementing the plan means putting it into action and ensuring outlined procedures are followed. The plan must be made available to all workers as a paper and/or electronic copy. Implementing the plan includes training, communicating and enforcing. (See page 18).

Train everyone

Everyone must participate in training relating to harassment prevention and the HPP. It is the employer's responsibility to ensure that training meets their requirement under the OHS legislation. General training may include:

- Harassment – definition and types
- Preventing harassment - respectful workplace, conflict resolution
- Roles and responsibilities in the HPP
- Reporting harassment
- Documentation requirements
- Investigation process
- Confidentiality and privacy

Employers should train managers and supervisors in their specific roles and responsibilities in harassment prevention. Anyone who is involved in an investigation should also be trained in the organization's harassment prevention plan and how to follow it effectively to perform their role.

Harassment education could also be included in other training sessions, such as management training, orientation programs for new employees, courses for union-management committees, social skills training for employees, safety shares.

Communicate the plan

Employers should ensure regular communication of the plan to all workers and supervisors. This could be achieved through:

Orientation or information sessions



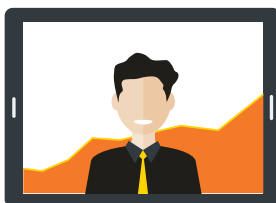
Staff meetings



Emails



Videos

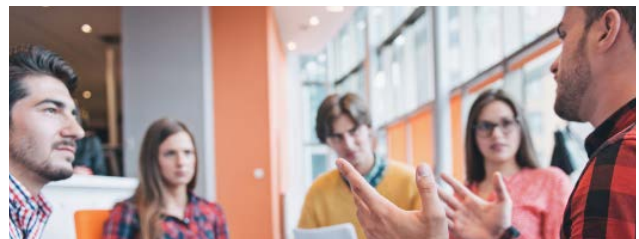


Posters/brochures



Enforce corrective actions

Ensure that corrective actions outlined by employers are followed and documented when an incident of harassment has been confirmed. In addition, follow-up on corrective actions to ensure they are effective and working as intended.



3. Maintain Harassment Prevention Plan

The employer is required to review and revise the HPP as necessary, but at least annually, to ensure it is effective. This review determines if procedures are sufficient and if there are any shortcomings or gaps that need updating.

This review may include:

- Requesting feedback from counsellors, managers and employees
- Being open to worker feedback and comments
- Reviewing the number of complaints made in the previous year, their nature, and how they were dealt with to identify trends or indications of successes or challenges
- Conducting exit interviews with personnel leaving the organization
- Adjusting policy and procedures as needed/required

SAMPLE - HARASSMENT COMPLAINT REPORT FORM

This form may be completed by an employee who has allegedly been harassed in the workplace. When completed, send to _____. (Department and name of person to submit the report)

Complainant information

Name:

Department:

Position Title:

Contact information:

Alleged Harasser Information

Name:

Department:

Position Title:

Contact information:

Description of the Alleged Harassment

Please describe, in as much detail as possible, the incident (s) of alleged harassment. You may attach additional sheets if required. Please include:

- who was involved
- what was specifically said or done (words, tone, actions, etc.)
- when it happened (dates and time)
- where it happened
- any witnesses to the incident(s) (name and contact information, if possible)
- how it impacted you
- if it was reported to management with the following details:
 - name of manager/supervisor:
 - date and time of reporting:
 - actions taken:
 - other relevant details:

Temporary measures
Do you believe that the employer needs to take any interim measures while the incident is under investigation? Yes _____ No _____
If yes, please describe what you think is necessary to prevent this situation from happening again and why.

Other Processes
Have you initiated any other processes to deal with these allegations of harassment (i.e. one-on-one discussions with the alleged harasser, grievance, Human Rights Commission, legal action, etc.)

SAMPLE - Guidelines for Investigations

Starting the investigation

Once notification of (e.g. an allegation of) harassment is received, get the complainant's allegations in writing. This will allow everyone involved to be clear about the details of the allegation. If it is not possible to obtain a documented version of the allegation, the investigator should plan a meeting and listen to the complainant's concerns. The investigator must then document those concerns.

At this time, it is important to establish if the conduct in question meets the definition of harassment.

If the investigator determines that the conduct does not meet the definition, the complainant must be informed of the decision and advised that there will be no further action on the matter.

If the investigator determines that the conduct in question does meet the definition of harassment, it must be determined if any immediate action is required to protect the complainant or other persons from further harassment, reprisal or retaliation while they wait for the investigation and resolution of the complaint.

An investigation process can then be created, including:

- A list of persons to be interviewed (e.g. complainant, alleged harasser, witnesses, supervisor, others with relevant information)
- A review of any documents related to the allegation
- Interview questions

Interview basics

- Interviews should be conducted individually in a private area.
- Review the investigation process with each person being interviewed (interviewee). Inform them why they are being interviewed, what will be done with the information and who may receive a copy. It is important to remind all interviewees that confidentiality must be maintained.
- Ask for any information the interviewee may have. Ask them to give as much detail as possible. Inform the interviewee that you are looking for facts. If they are unsure about a matter, they should say so.
- At the end of the interview, review the information gathered with each interviewee. This will help to confirm the accuracy of the information gathered and allow for the interviewee to add any additional information.



Documenting the interview

- Whenever possible, have the interviewee document their information (e.g. detail of events). You can ask for more details during the interview. If it is not possible for the interviewee to do this, the interviewer may take notes during the interview.
- All notes must be legible and written in blue or black pen. If a mistake is made, cross it out with one line and initial.
- Include the following information in the notes:
 - o Name of person being interviewed
 - o Date and time of the interview
 - o Who was present for the interview
 - o Questions asked and the corresponding answers
- Ask the interviewee to sign and date the documented statement once complete.
- Attach all interview documents/notes to the final report.

Interviewing the witness(es)

- Ask the witness to explain what they heard or saw. Get the details:
 - o What, when and where did it happen?
 - o Who was present?
 - o Who did and said what to whom?
 - o Was the incident an isolated event or part of a pattern?
 - o Is there anyone else who might have relevant information?

Interviewing the complainant

- Inform the complainant of the steps the company will be taking in the investigation. This should include the names of those who will receive information about the allegation, the names of those who will be interviewed and the steps to be taken once the investigation is concluded.
- Ask the complainant to tell you about the incident(s). If needed, this is where you can ask for more details, such as:
 - o When did the conduct occur? How often did it occur? Where did it occur? Who was involved?
 - o Who did and said what to whom?
 - o What is the relationship between the complainant and alleged harasser?
 - o What are the current interactions with the alleged harasser?
 - o How did the complainant feel about the behaviour at the time it occurred? How did the complainant respond to the behaviour?
 - o Was there a pattern of similar behaviour toward this complainant or another employee?
 - o What did the complainant say or do to indicate to the alleged harasser that the conduct was unwelcome?
 - o Did the complainant tell any other employees/supervisor about what happened? If not, why not?



- o Did the complainant make any notes about what happened?
- o Were there any witnesses? If so, what are their names?
- o Ask the complainant what action(s) would be considered reasonable to resolve the matter.
- o Explore any time lapse that might exist between the alleged act of harassment and reporting it to the employer.

Interviewing the alleged harasser

- Explain the allegation(s) in detail and confirm that the company takes these types of complaints seriously. Alleged harassers are entitled to be informed of all allegations made against them and allowed to defend against these allegations. This does not mean they are entitled to see or receive copies of statements. However, they are entitled to see or receive a summary of the evidence.
- Inform the alleged harasser of the steps the company will take in the investigation. This should include the names of those who will receive information related to the allegation, who will be interviewed and the steps to be taken once the investigation is concluded.
- Obtain the alleged harasser's reply to the allegation(s) in writing.
- Determine the nature of the relationship between the alleged harasser and the complainant (e.g. personal, professional).
- Determine if the complainant(s) initiated or participated in any inappropriate discussions, jokes, gestures.
- Determine if the complainant(s) ever objected to any of the alleged harasser's actions and how they responded.
- Ask the alleged harasser why they believe the complainant has made the complaint (e.g. any motives to fabricate the story?)
- Ask for the names of all witnesses the alleged harasser believes should be interviewed as part of the investigation.
- Explain that the company will not permit any retaliation against the complainant and that if the alleged harasser, or other persons, tries to do so, there will be disciplinary action.

The report

Once all information is collected and interviews conducted, a report must be prepared detailing the findings of the investigation. The report must state whether the complainant's allegations were substantiated or not. The content of the report should include:

- Names of persons conducting the investigation, other persons involved and interviewed
- Date, time and place of the alleged harassment
- Description of the alleged harassment
- Graphics, photographs or evidence
- Findings of the investigation, including the facts and reasons for determining if harassment took place or not

- Immediate and long-term corrective action to be taken
- Reasons why no corrective action will be taken

The employer must meet separately with the complainant and the alleged harasser to explain the conclusions in the report, along with any disciplinary action to be taken or other steps that will be put in place to stop a repeat of the offensive conduct.

If the results of the investigation are inconclusive, the employer should explain that the investigation was unable to make a clear determination of the events that occurred and that the company will monitor the situation to ensure no further offensive conduct takes place.

Sources:

- SAFE Work Manitoba
- Government of Alberta (Occupational Health and Safety)
- Government of Newfoundland Labrador

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Sample Prevention Plan

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Sample Harassment Prevention Plan

The following example of a harassment prevention plan will provide practical guidance on developing a plan for your workplace. Be sure to add, remove or change information as needed to make it specific to your needs.

Harassment prevention plan for _____ **Company Name**

Management at _____ **Company Name** _____ is committed to providing a safe, respectful and harassment free work environment for all staff and customers. No one has the right to harass anyone, at work or in any situation related to employment with this organization.

What is harassment?

Workplace harassment means inappropriate, vexatious conduct or comment by a person to a worker that the person knew or ought to have known would cause the worker to be humiliated, offended or intimidated.

It can take place at work or in a situation connected to work; can happen repeatedly or only once; be intended or unintended; and can be written, verbal, physical, a gesture or display, or any combination of these. It can include electronic messages to a person or social media posts.

Examples of harassing behaviour may include:

- Unwelcome conduct, comments, gestures or contact which causes offense or humiliation
- Misusing power or authority
- Referring to a person using terms or pronouns that do not align with the person's affirmed gender
- Physical or psychological bullying which creates fear or mistrust, or which ridicules or devalues the individual
- Excluding, intimidating or isolating individuals
- Making inappropriate gestures/comments
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- Discriminating based on gender
- Cyberbullying, such as posting offensive or intimidating messages through social media or email
- Deliberately setting the individual up to fail

Reasonable and fair actions taken by an employer or supervisor, in a respectful manner, to manage and direct workers is NOT harassment. Examples of this include:

- Changing work assignments
- Scheduling, assessing and evaluating work performance
- Inspecting workplaces
- Implementing health and safety measures
- Taking disciplinary action such as dismissing, suspending, demoting, or reprimanding with just cause

Section 22 – 24.2 of the Newfoundland and Labrador OHS Regulations requires every workplace to have a harassment prevention plan.

Employer/Supervisor responsibilities

Management at _____ **Company Name** _____ is committed to eliminating, where possible, or otherwise, minimizing the hazard of workplace harassment.

Managers and supervisors are responsible for a safe work environment, free of harassment. The employer, supervisors and managers are required to apply and comply with the harassment prevention plan and associated procedures.

Reported incidents of workplace harassment will be investigated in accordance with the procedure outlined below.

_____ **Company Name** _____ will protect workers from retaliation and provide support to workers when workplace harassment occurs.

Worker rights and responsibilities

Workers are entitled to work free of harassment at _____ **Company Name** _____.

Workers have the responsibility to treat each other with respect and not engage in bullying or workplace harassment. We ask that anyone who experiences harassment or sees another person harassed report it to _____ **Individual Name/Position** _____.

Workers are responsible to:

- Not engage in bullying or workplace harassment
- Report observations or experiences of bullying or harassment
- Participate in education and training
- Comply with the prevention plan and associated procedures

Confidentiality and Workers' rights under various laws

The company and its managers will not identify a complainant, an alleged harasser or any circumstances about a complaint, including personal information, to anyone, unless, it is necessary:

- for the purpose of the investigation
- for corrective action relating to the complaint
- where required by law

This plan is not intended to discourage a worker from exercising his or her rights under the Human Rights Act, 2010, the Criminal Code (Canada) or any other law of the province or of Canada.

The prohibited grounds outlined in the Human Rights Act, 2010 include discrimination based on:

- | | |
|---|--|
| • Race | • Sex (including discrimination on the basis that a woman is or may become pregnant) |
| • Colour | • Sexual orientation |
| • Nationality | • Gender identity |
| • Ethnic origin | • Gender expression |
| • Social origin | • Marital status |
| • Religious creed | • Family status |
| • Religion | • Source of income |
| • Disability (including perceived disability) | • Political opinion |
| • Age | |

Reporting procedures

If you believe you are being harassed, tell the person harassing you to stop, if it is safe and you feel comfortable to do so. You can do this in person or in writing. If you cannot deal with them directly, or if your request is unsuccessful, follow the procedures for reporting harassment. Complete the Harassment Report Form (Appendix A) when making a formal complaint of harassment.

Report the incident or situation to your supervisor or _____
(identify a specific manager or designated person for harassment complaints).

Harassment by Employer/Supervisor

Report the incident or situation to _____ (identify a specific external third party for reporting harassment).

Incidents of harassment should be reported as soon as possible, but no later than 12 months after the most recent incident.

Investigation

The purpose of an investigation is to gather additional information related to the reported incident of harassment and to determine whether or not harassment has occurred.

Once the complaint has been received, it will be investigated thoroughly and promptly by investigator name/ department within the following timelines:

- When a complaint is received by the supervisor or the external third party, a meeting will be scheduled with the complainant within five days to begin the investigation process.
- Interviews with the complainant, the alleged harasser and any witnesses will be conducted to confirm the details of the alleged harassment within 15 days.
- Investigation report will be available within 90 days to the complainant and the alleged harasser.
- Both parties will have 14 days to respond to report. After this time period has expired, corrective actions may be taken.

Where this timeline cannot be met, reasons for the delay and the projected new date of completion must be documented for the file.

Notification of results

When the investigation is complete, _____ (identify appropriate company representative or manager) will inform the person who filed the complaint and the alleged harasser of the results of the investigation in a timely manner.

Corrective action for harassers

Employees who harass another person will be subject to corrective action by the employer. Corrective actions include, but are not limited to:

- Employer to identify corrective actions

Support for workers

Employees who have been affected by workplace harassment may be supported through:

- Employer to identify supports

Education and training

Company Name commits to making sure all of its employees, supervisors and managers are trained in harassment prevention and the company's harassment prevention plan.

Monitoring

Company Name will monitor this plan, review annually and make adjustments whenever necessary. If you have any concerns with this plan, please bring them to the attention of _____ (identify appropriate manager).

Signature _____ Date _____

FACTS

Harassment prevention plan

Occupational Health and Safety Legislation outlines the requirements for employers to develop, implement and maintain a written harassment prevention plan. This plan includes the obligations of workers, supervisors, and employers to prevent and address bullying and harassment.



Workplace harassment means inappropriate vexatious conduct or comment by a person to a worker that the person knew or ought to have known would cause the worker to be humiliated, offended or intimidated.

For additional information, please refer to WorkplaceNL's Harassment Prevention Plan

Contact us

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Checklist of Duties

Workers must

- ☐ Not engage in bullying and harassment
- ☐ Report observations or experiences of bullying and workplace harassment
- ☐ Comply with the employer's harassment prevention plan
- ☐ Participate in training

Supervisors must

- ☐ Not engage in bullying and harassment
- ☐ Ensure the health and safety of workers
- ☐ Apply and comply with the employer's harassment prevention plan
- ☐ Participate in training

Employers must

- ☐ Not engage in bullying and harassment
- ☐ Develop a harassment prevention plan
- ☐ Take steps to eliminate or minimize the hazard of workplace harassment
- ☐ Develop and implement procedures for reporting instances of harassment
- ☐ Develop and implement procedures for investigating complaints of harassment
- ☐ Set out procedures for notification of investigation results and any corrective actions
- ☐ Participate in harassment prevention training
- ☐ Train employees in harassment prevention and the harassment prevention plan
- ☐ Review the harassment prevention plan at least annually and revise as necessary
- ☐ Protect workers from retaliation and provide support when workplace harassment occurs

Workplace Violence and Harassment Due Dilligence CHECKLIST

Conduct a Workplace Violence Risk Assessment

Consider:

- ☐ Previous experience in the workplace
- ☐ Occupational experience in similar workplaces
- ☐ The location and circumstances in which work may take place
- ☐ Workplace characteristics including demographics, culture and the presence of new workers
- ☐ Issues raised by the occupational health and safety committee, or the worker health and safety representative/designate
- ☐ Personal information will be kept confidential and shall not be disclosed except for the purpose of an investigation or where required by law

Develop and Implement a Harassment Prevention Plan

Include:

- ☐ Every worker is entitled to employment free from workplace harassment
- ☐ Employer is committed to eliminating, where possible, or otherwise, minimizing the hazard of workplace harassment
- ☐ Worker's obligation to take reasonable care to not engage in bullying or workplace harassment, report observations or experiences of bullying and workplace harassment, and comply with the harassment prevention plan

- ☐ Supervisor's obligation to ensure the health and safety of workers, including the supervisor's obligation to apply and comply with the harassment prevention plan
- ☐ A statement that any information obtained relating to workplace harassment, including personal information, will not be disclosed unless it is necessary for the purpose of an investigation, corrective action relating to the complaint or where required by law
- ☐ Procedures for reporting, investigation and notification of results
 - Procedures for workers to report instances of harassment to an employer or supervisor or where the employer or supervisor is the alleged harasser, the procedures to report harassment to an external third party
 - Procedures to be followed after a complaint of workplace harassment is received and the manner in which a complaint is investigated. An employer shall investigate complaints of workplace harassment
 - Procedures regarding notification of results of investigations and any actions to be taken as a result of an investigation
- ☐ A statement that the harassment prevention plan is not intended to discourage a worker from exercising his or her rights under the Human Rights Act, 2010, the Criminal Code (Canada) or any other law of the province or of Canada
- ☐ Include a statement that the employer shall protect workers from retaliation and provide support to workers when workplace harassment occurs
- ☐ Training on harassment prevention and the harassment prevention plan

The harassment prevention plan shall be:

- ☐ Accessible to all workers in the workplace
- ☐ Reviewed as necessary, but at least annually

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