



HEALTH, SAFETY &
ENVIRONMENTAL MANUAL

3.8 Workplace Violence and Harassment Program

Revision Number: **R0**

Number of Pages: **8**

Revision Date:

Approval Date:
10/01/2024

Effective Date:
10/01/2024

SIGNATURE:

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

PURPOSE

J-AAR is committed to building and preserving a safe, productive, and healthy working environment for its employees, free from violence and harassment. The company will take all reasonable measures to ensure employees, clients, subcontractors and visitors are not subject to any form of violence or harassment. This commitment applies to all areas of business, including training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.

DEFINITIONS

Complainant

A person who has made a complaint about another individual who they believe committed an act of violence or harassment against them.

Respondent

A person whom another individual has accused of committing an act of violence or harassment.

Workplace Violence

The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker.

An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.

A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.



Examples of workplace violence include:

- verbally threatening to attack a worker;
- leaving threatening notes at or sending threatening e-mails to a workplace;
- shaking a fist in a worker's face;
- hitting or trying to hit a worker;
- wielding a weapon at work;
- throwing an object at a worker;
- sexual violence against a worker;
- kicking an object the worker is standing on such as a ladder or
- trying to run down a worker using a vehicle or equipment.

Workplace Harassment

Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or workplace sexual harassment.

Workplace harassment can involve unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating, or demeaning to a worker or group of workers. It also includes behavior that intimidates isolates or even discriminates against the targeted individual(s).

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

Workplace Sexual Harassment

Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Examples of workplace harassment may include:

- making remarks, jokes or innuendos that demean, ridicule, slander, intimidate, or offend;
- displaying or circulating offensive pictures or materials in print or electronic form;
- bullying;
- repeated offensive or intimidating phone calls or emails;
- inappropriate sexual advances, suggestions or requests.

What isn't workplace harassment?

Reasonable action or conduct by an employer, manager or supervisor that is part of their normal work functions would not normally be considered workplace harassment. This is the case even if there are unpleasant consequences for a worker. Examples include:



- changes in work assignments;
- scheduling;
- job assessment and evaluation;
- workplace inspections;
- implementation of dress codes or PPE
- disciplinary action.

Differences of opinion or minor disagreements between co-workers would also not generally be considered workplace harassment.

In addition, any behavior that would meet the definition of workplace violence would not be considered workplace harassment.

SCOPE

Acts of violence or harassment will not be condoned or tolerated by the company. This includes acts involving employees, clients, subcontractors, visitors, or any other person that may be associated with J-AAR and the workplace. This document outlines the J-AAR violence and harassment program, including how incidents of violence and harassment will be handled and investigated.

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

This program has been developed in consultation with the JHSC and will be reviewed as often as necessary to ensure that it accurately represents the company compliance with legislation and objectives.

J-AAR will provide all employees with appropriate training and information regarding the company's violence and harassment prevention practices and procedures. Employees are responsible for adhering to this policy and need to report every incident of violence or harassment immediately to management. This includes any incidents that have been witnessed, experienced by, or reported to an employee.

For the purposes of this policy, workplace harassment or violence can occur:

- At the workplace;
- At employment-related social functions;
- In the course of work assignments outside the workplace;
- During work-related travel;
- Over the telephone, if the conversation is work-related; or
- Elsewhere, if the person is there as a result of work-related responsibilities or a work-related relationship.

PROCEDURES

Workplace Risk Assessments

J-AAR will conduct risk assessments of work environments to identify potential risks that could affect the company and the health and safety of employees, and will institute measures to eliminate or control any identified risks.



The following factors will be considered during the assessment:

- Past incidents of violence;
- Incidents that are known to occur in similar workplaces;
- The circumstances in which work takes place, including the type of work and conditions of work;
- The interactions that occur in the course of performing work; and
- The physical location and layout of the workplace.

The risk assessments may include reviews of records, employee incident reports, health, and safety inspection reports, first aid records, or other related records. Areas that will be considered and may contribute to risk of violence include but are not limited to contact with the public, exchange of money, receiving areas, and working alone or at night.

Information about a Person with a History of Violent Behaviour

The company will disclose information to workers who are likely to encounter a known person with a history of violence in the performance of their job duties, or if there is a potential risk of workplace violence because of interactions with the person with a history of violence. However, the company will

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

only disclose personal information that is deemed reasonably necessary to protect the worker from physical harm.

However, this duty is limited and applies only when the:

- worker can be expected to encounter the violent person in the course of his or her work and;
- risk of workplace violence is likely to expose the worker to physical injury.

Employers and supervisors must also not disclose more information than is reasonably necessary for the protection of a worker from physical injury.

The employer must take into account a person's right to privacy under certain laws in addition to a workers' right to be informed of workplace violence risks under the O.H.S.A.

Domestic Violence

A person who has a personal relationship with a worker- such as a spouse or former spouse, current or former intimate partner or a family member- who may physically harm, or attempt or threaten to physically harm, that worker at work. In these situations, domestic violence is considered workplace violence. If J-AAR becomes aware that domestic violence is likely to expose an employee to physical injury in the workplace, the company will take every precaution reasonable in the circumstances for the protection of the worker.

Emergency Response Plan- Summoning Assistance

The following measures and procedures must be followed when an incident of violence has occurred or is likely to occur and immediate assistance is required.

Employees shall:

- Immediately call for emergency services - call 911, if needed.
- Contact your supervisor or manager immediately.

Supervisors shall:



- Provide all necessary information to the police if required.
- Report the incident to Top Management as soon as possible.

Investigation Procedures

Once a complaint has been received, J-AAR will complete a thorough investigation. The company will ensure that, where practicable, the investigation is initiated within 24 hours of the complaint being filed.

The investigation will include:

- Informing the respondent of the complaint;
- Interviewing the complainant and any persons involved in the incident;
- Identifying and interviewing any witnesses; and

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

- Obtaining statements from all parties involved.

NOTE: If the Supervisor is the alleged respondent, then the complainant can report to a Manager, Owner, the Ministry of Labour, or Police.

All the above information will be documented and used to determine whether an incident of violence or harassment occurred. If necessary, J-AAR may employ outside assistance or request the use of legal counsel. No unnecessary workplace parties will be involved in investigations, nor will they be provided with any identifying information about the parties involved.

A copy of the complaint detailing the complainant’s allegations will be provided to the respondent, who will be invited to reply in writing to the complainant’s allegations. The reply will be made known to the complainant before the case proceeds.

The company will take all measures to prevent any disclosure of the incident and the identities of the parties involved, unless the disclosure is necessary for the investigation, for taking corrective action or required by law.

Results of Investigation

Upon completion of an investigation, J-AAR will provide both the complainant and respondent a written summary of the findings of the investigation and any corrective action that has been or will be taken because of the investigation. This written notification will be provided within 7 days of the investigation being completed and will not include the investigation report unless required by law.



Control Measures

Where J-AAR determines that violence or harassment has occurred, control measures will be implemented to eliminate or control the risk of violence or harassment to a worker because of the investigation. These control measures will be determined on a case-by-case basis, depending on the situation investigated. Any control measure enacted will be communicated to the complainant and respondent, as well as any other employees the measure affects.

Some general control measure to consider:

Mobile Crews (Worksites)

- Ensure you are able to call for help. Use 2-way radios and/or cell phones in an emergency.
- Keep vehicles well maintained.
- Park all vehicles/equipment in designated safe areas. Inspect as often as necessary.
- Keep trailers locked when not in use. Maintain all the lighting if possible.
- Designate a safe meeting area for all workers in case of emergency.
- Work in groups when possible. Work the same operating hours as other workers. If working alone, follow safety procedures for working alone.

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

- Perform regular jobsite inspections.
- Review any potential jobsite risks from tender documents and/or client.
- Report all suspicious persons to supervisor.

Offices



- Maintain outside lighting and keep paths, walkways and parking areas clear of obstructions.
- Maintain visitor / public entrances.
- Keep all doors not in use locked or secure.
- Maintain security alarm and security cameras, if available.
- The front reception area should be staffed during business hours. Lock visitor doors when reception is unavailable. Keep all windows, doors, and sightlines clear.
- All visitors must report to the front reception desk and only enter employee areas of the building when escorted by an employee.
- Keep all cash and other valuable goods locked and hidden.
- Designate a safe meeting room(s) for employees during emergencies.
- Keep all lines of communication operating- 2-way radios, phones.
- Work in groups. Maintain regular operating hours with other employees. If working alone, lock all non-essential doors. Follow working alone policy.

Drivers / Transport

- Passengers are restricted to company employees or those satisfactory to the driver. The public is not given access to vehicles.
- Any cash/documents are to be kept in a locked vehicle and handed in at the end of the shift.
- Maintain communication with other employees (i.e. dispatch, supervisor) with 2-way radios or cell phones. If working alone, follow the policy.
- Keep vehicles regularly maintained.
- Park in designated, well-lit areas.
- If drivers are to work in high-risk locations, information will be given by office/dispatch prior to job start.
- Never leave your vehicle / machine unlocked at night or on breaks.

Mobile Service Mechanic

- Ensure you can call for help. Use 2-way radios and/or cell phone in an emergency.
- Utilize “Lone Worker” monitoring software along with vehicle GPS.
- Passengers are restricted to company employees or those satisfactory to the driver. The public are not given access to vehicles.
- Only perform high risk maintenance or service activities when other workers are present.
- Keep the vehicle well maintained.
- Never leave your vehicle unlocked at night or on breaks.
- Park all vehicles/equipment in designated safe areas.

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

- Work the same operating hours as other workers if possible. If working alone, follow procedures for working alone. Use work alone monitoring app.
- Report all suspicious persons to supervisor.

Pits / Scale Houses

- Maintain outside lighting and keep paths, walkways and parking areas clear of obstructions.
- Park in designated, well-lit areas.
- Keep all doors and gates locked when not in use.
- If possible, communicate and conduct business with visitors through windows/counters.
- Ensure you are able to call for help. Use phones, 2-way / CB radios in an emergency.
- Work in groups if possible. Work the same operating hours as other workers. If working alone, follow written company procedures.
- Keep cash and valuables locked and hidden.
- Check all security alarms are functioning.

Disciplinary Measures

Any disciplinary action will be determined by managers and will be proportional to the seriousness of the behaviour or action involved in the incident.

If the company determines that an employee has been involved in an incident of violence or harassment towards another employee, immediate disciplinary action will be taken, up to and including immediate dismissal.

Recommendations to Victims



The company will provide appropriate assistance to any employee who is a victim of violence or harassment. J-AAR recommends that a worker who has been harmed as a result of an incident of violence at the workplace consult their health care provider for treatment or referral for post-incident counselling, if appropriate.

The Right to Refuse Unsafe Work

Employees have the right to refuse work if they have a reason to believe that workplace violence is likely to endanger them. Upon refusing to work, the employee must report the circumstance of the refusal to their supervisor. An investigation will follow in accordance with the J-AAR work refusal policy and all relevant legislation.

Fraudulent or Malicious Complaints

It is a violation of this program for anyone to knowingly make a false complaint, or to provide false information about a complaint. Unfounded or frivolous allegations may cause both the respondent and the company significant damage. Any employee who knowingly makes a false allegation related to violence or harassment will be subject to immediate disciplinary action, up to and including termination of employment.

 HEALTH, SAFETY & ENVIRONMENTAL MANUAL	3.8 Workplace Violence and Harassment Program			
	Revision Number: R0		Number of Pages: 8	
	Revision Date:	Approval Date: 10/01/2024	Effective Date: 10/01/2024	SIGNATURE: 

WORKPLACE VIOLENCE AND HARASSMENT PROGRAM

Confidentiality

J-AAR will not disclose the name of a complainant or a respondent or the circumstances related to the complaint to any person except where disclosure is necessary to investigate the complaint or take corrective action with respect to the complaint or required by law. The company will only disclose the minimum amount of personal information or details necessary for these purposes.

All records, and subsequent investigations, are considered confidential and will not be disclosed to anyone except to the extent required by law. The company will do everything reasonably possible to protect the privacy of any individuals involved and to ensure that complainants and respondents are treated fairly and respectfully.

ENFORCEMENT

Following this program is a condition of employment for all employees. This will be enforced strictly by management and supervision. Failure to follow this procedure, as set out, may lead to progressive discipline up to and including dismissal or removal from site as deemed appropriate by J-AAR.

REVIEW

In accordance with the *Occupational Health and Safety Act*, the policy statement will be posted in a conspicuous place in the workplace and reviewed annually.

DOCUMENT AND RECORD CONTROL

All documents and records generated from this procedure will be stored as hard copy or on J-AAR digital servers indefinitely.