



## Workplace Violence & Harassment Prevention Policy

**Direct Staffing Solutions Inc** is committed to maintaining a safe and healthy work environment.

Managers, Supervisors, Visitors and all Workers, including Temporary Workers, all persons conducting business with this company, are expected to uphold this policy. We will always take appropriate and reasonable steps to protect our workers from potential risks associated with violence and harassment in the workplace. We will not tolerate behavior from anyone that intimidates, threatens, harasses, abuses, injures or otherwise victimizes our employees. Everyone is expected to uphold this policy and to work together to prevent workplace violence and harassment. Where violent or harassing behavior is substantiated in the workplace, the employee(s) will be subject to appropriate corrective actions and/or disciplinary up to and including termination.

**“Workplace Violence”** means,(a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker.(b) an attempt to exercise physical force against a worker, in the workplace, that could cause physical injury to the worker.(c) a statement or behavior that 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.

**“Workplace Harassment”** means, engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably known to be unwelcome.

**“Vexatious Comment”** means causing annoyance or worry, disturbing, provoking, irritating, troublesome or bothersome.

This policy conforms with the Statutes of Ontario, 2009, amendments to the Occupational Health and Safety Act. Direct Staffing Solutions Inc has developed a workplace and harassment program that implements this policy. 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 that raise concern.

**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; wielding a weapon at work; hitting or trying to hit a worker; throwing an object at a worker; sexual violence against a worker; kicking an object the worker is standing on such as a ladder; trying to run down a worker using a vehicle or equipment such as a forklift;

### Employer Commitment

This policy is endorsed by the Senior Management of Direct Staffing Solutions Inc, ensuring that procedures are in place, employees are informed, appropriate resources are available, regular risk assessments are conducted and program modifications are performed. Senior Management will take all reasonable precautions to protect employees from workplace violence and harassment and to ensure that employees are aware of their rights and responsibilities. All complaints will be investigated in a confidential, fair and timely manner unless disclosure is required by law, or necessary for investigation and/or discipline.

### Employee Commitment

It is the responsibility of each employee to be aware of and follow procedures that are in place to protect themselves and others from workplace violence and harassment. Employees are encouraged and required to immediately report all incidents to management. Employees will not be penalized, reprimanded or in any way criticized when acting in good faith bringing forward a complaint or providing information regarding a complaint or incident of workplace violence or harassment.

**If any employee becomes aware of any actual or imminent threat of violence**, obtaining emergency assistance should be first priority, and law enforcement authorities should be contacted immediately by dialing **911**. Immediately after contacting law enforcement authorities, the employee must report the incident to Direct Staffing Solutions Inc. Staffing Coordinator/Management (416-759-1500) between the hours of Monday to Wednesday 7:30am-5:30pm and Thursday and Friday 7:00am-6:00pm, **after business hours and weekends** (905)424-3403 or (905)424-3449).

Acts of harassment or discrimination are not acceptable and will not be tolerated. Employees whenever he/she feels that they have been a victim of harassment or discrimination. A complaint must be made to Management on site and to Direct Staffing Solutions Inc Coordinator/Management (416-7591500) between the hours of Monday to Wednesday 7:30am-5:30pm and Thursday and Friday 7:00am-6:00pm, **after business hours 6:00pm and weekends**. (905)424 3403-(905)424-3449



## Work Place Violence and Harassment Prevention Program

### PURPOSE and SCOPE

DSS Inc recognizes the rights, dignity and worth of every employee. Wherever people interact at work there is a potential for violence and harassment regardless of the job. This Work Place Violence and Harassment Prevention Program sets out detailed steps that will be taken to ensure that DSS Inc employees are protected from violence in the workplace hazards and protected from the effects of harassment and discrimination in the workplace, which ultimately has been designed to implement our Violence and Harassment Prevention Policy and to meet the provisions of Occupational Health and Safety Legislation and Human Rights Legislation, which require measures and procedures to prevent violence in the workplace and to protect workers.

Program parameters include, but are not limited to:

- Creating and fostering a work environment free from workplace violence, harassment and discrimination;
- Providing a definition of workplace violence and harassment and discrimination;
- Establishing and detailing the responsibilities of all persons in DSS Inc workplaces to maintain a workplace free of harassment and discrimination; free of actual, attempted or threatened violence;
- Ensuring that a process for problem resolution in relation to matters of discrimination or harassment are in place;
- Ensuring that incidents of workplace violence are reported to Company Management and/or law enforcement as appropriate;
- Ensuring that complaints of workplace violence, harassment and discrimination are handled in a timely and equitable manner by the Company;

This Program applies to all DSS Inc employees regardless of position or classification. These standards and steps also apply to all persons who attend a Company workplace including, but not limited to all temporary employee(s), visitors, contractors, vendors and delivery persons. For the purposes of this Program, a Company workplace includes all places where DSS Inc business occurs and includes all:

- Company buildings (whether owned or leased) and surrounding perimeter including parking lots, sidewalks, and driveways ("Company Grounds");
- Company vehicles;
- Off-site locations where Company business occurs;
- Company-sponsored functions and recreational or social events, whether taking place on Company Grounds or elsewhere;
- Travel for Company business;

This policy also extends to any circumstances where DSS Inc becomes aware of any domestic violence that has the potential to cause physical injury to workers in a DSS Inc workplace or business occurs.

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## **PROGRAM**

### **1.0 Definitions**

Our Violence and Harassment Prevention Policy states that DSS Inc is committed to maintaining a safe and healthy work environment. Free of workplace violence, harassment and discrimination in the workplace. Any conduct that creates an intimidating, hostile, offensive or threatening work environment through words, actions, attempted or actual use of physical force against or by an employee will not be tolerated. For the safety and well being of everyone at DSS Inc and includes all places where DSS Inc business occurs, no one may:

- Carry/Bring a weapon onto DSS Inc property which includes any place where business occurs including buildings, parking lots, walkways and any other owned or leased by DSS Inc. (Law Enforcement officers are exempt from this requirement);
- Physically harm another person. This includes, but not limited to, physical acts such as punching, hitting, kicking, pushing, damaging property or throwing objects;
- Make threatening remarks, statements(or a series of actions or statements) that would be reasonably be thought to be a threat of physical harm, or to safety or security;
- Act with hostility or aggression toward another person;
- Intentionally or carelessly damage DSS Inc property or where DSS Inc business occurs or another employee(s) property;
- Stalk or intimidate an employee of DSS Inc or where DSS Inc business occurs. i.e DSS Inc Clients, Supervisors

DSS Inc believe that every employee has a right to freedom from unlawful harassment and discrimination under human rights legislation, which prevents harassment and discrimination on the basis of sex, race, colour, national origin, ancestry, religion, physical or mental disability, age or any other characteristics protected by law. We also believe that every employee has a right to freedom from harassment as defined by health and safety legislation, which includes 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. A course of vexatious comment may include remarks, innuendoes, repeated offensive or intimidating comments, phone calls or emails, amongst other matters.

Discrimination includes the differential treatment of an individual or group based on actual or presumed membership in or assumed association with some class or group of persons, rather than on the basis of personal merit, or based on one or more of the prohibited grounds, or the failure to make reasonable accommodation for the special needs of any individual or group if those special needs are based on the prohibited grounds.

Harassment means any vexatious(*vexatious-causing annoyance or worry, disturbing, provoking, irritating, troublesome, bothersome*), abusive, intimidating or unwelcome act, behavior, omission, comment or gesture that is known, or ought reasonably to be known to be vexatious, abusive, intimidating or unwelcome, including that with the purpose or effect of:

- i. Creating an intimidating or hostile work environment;
- ii. Affecting an employee's dignity or psychological or physical integrity;
- iii. Unreasonably interfering with or otherwise adversely affecting an individual's work performance;
- iv. Creating a risk to the health or safety of an employee;
- v. Adversely affecting an individual's employment and/or advancement opportunities.

### **2.0 Compliance With The Workplace Violence and Harassment Prevention Policy and Program**

DSS Inc values the health and safety and wellbeing of its employees and expects that its workplaces will be free of workplace violence, harassment and discrimination. DSS Inc will not tolerate incidents of workplace violence, harassment and discrimination perpetrated against or by any employee, customer, vendor, contractor, visitor or any other person at a Company workplace where DSS Inc business occurs.

Every person at a Company workplace is responsible for acting in compliance with our Workplace Violence and Harassment Prevention Program. Where workplace violence occurs, DSS Inc or where Company Business occurs may, where appropriate:

- Remove the perpetrator from a Company workplace by Security or the Police;
- Discipline a employee, up to and including dismissal, and/or report the conduct to the police;
- Report the conduct of any other person to their employer, supervisor, and/or to the police.

All physical assaults involving an employee or occurring at a Company workplace will be reported to Police. Threats of physical violence will be reported to the police as appropriated.

### **3.0 Roles and Responsibilities**

It is the responsibility of:

#### **3.1 Senior Management of DSS Inc**

- To take reasonable preventative measures, provide the support and resources necessary to ensure this standard will be complied and to ensure that Company workplaces are free from workplace violence and harassment and discrimination free;
- To ensure that all employees are trained in the Policy and this Program;
- To establish a process for reporting and responding to incidents of workplace violence.
- To ensure the process for reporting and responding to incidents of workplace violence is communicated, maintained and followed.
- To post the Violence and Harassment Prevention Policy in a conspicuous place in the workplace(s).
- To ensure that the Violence and Harassment Prevention Policy is communicated to Companies where DSS Inc business occurs and ensure that any required workplace violence prevention actions are taken by Managers/Supervisors as required for those persons who attend workplaces for DSS Inc or business occurs;
- To establish a process for problem resolution, and for reporting and responding to complaints and any incidents of harassment or discrimination in the workplace;
- To ensure the process for problem resolution, reporting and responding to any incidents of harassment or discrimination in the workplace is communicated, maintained and followed;
- To ensure that the Violence and Harassment Prevention Policy and this Program are reviewed at least annually and conducted and reviewed as often as necessary to ensure that this program continues to protect workers.
- To develop procedures to address the workplace violence risks identified in the violence assessment.
- To ensure that employees are made aware of any tasks, positions, assignments that may have associated workplace violence hazards/risks and methods to be utilized to reduce or eliminate the risks of workplace violence.
- Ensure that all worksites complete a “Risk Assessment for Workplace Violence Form” in accordance to this standard.
- To ensure, in conjunction with Joint Health and Safety Committee, or companies where business occurs, that information relating to persons with a history of violent behaviour is provided or disclosed where required under the Occupational Health and Safety legislative provisions, and that no more information than reasonably necessary to protect workers from physical injury is disclosed to such companies where business occurs.
- Maintain on a confidential basis, all files and documents of complaints of harassment and discrimination and subsequent action unless legally permitted.

#### **3.2 Managers/Supervisors/Staffing Coordinators**

- To participate in training, understand, ensure compliance, provide support and resources necessary with the Violence and Harassment Prevention Policy Program and relevant human rights and health and safety legislation;
- To communicate and review the Violence and Harassment Prevention Policy and this Program with the employees they supervise or manage;
- Ensure that all employees sign the Acknowledgement of Receipt of the DSS Inc Harassment Prevention Policy and Program and receive training in the Policy and Program.
- To adequately train employee(s) on Company procedures that addresses the workplace violence risk(s) applicable to the employee(s).
- Actively promote and maintain a violent-harassment-discrimination-free workplace.
- To verify that all Companies where DSS Inc business occurs and employees who attend those workplaces are aware of the Violence and Harassment Prevention Policy(ies);
- To encourage employees to engage in problem resolution and to report, as necessary, complaints or incidents of violence, harassment or discrimination;
- To promptly report, take immediate action of all complaints or incidents of violence, harassment or discrimination they become aware of, receive or witness through the reporting processes set out this Program.
- To respond to all complaints or incidents of violence and harassment or discrimination in a professional manner appropriate for the circumstances of the complaint or incident. Ensure that no reprisal is initiated if a complaint is brought forward.
- Ensure discretion and confidentiality of a complaint, investigation and remedy is maintained.
- Participate in the investigation, as required, and provide relevant information related to the investigation.

- Ensure, participate in/ that the “Risk Assessment for Workplace Violence Prevention Form” has been completed in accordance to this standard.

### **3.3 Temporary Employees**

- To understand and follow with the Violence and Harassment Prevention Policies of DSS Inc at all times to protect themselves and others in the workplace from workplace violence and harassment.
- To immediately notify their supervisor and/or other designated person, i.e DSS Inc Staffing Coordinator, President of any incident of violence, harassment or discrimination.
- To immediately notify Management of any incident of workplace violence whether the notifying worker is the victim or not. In the case of an extreme or imminent threat of physical harm to themselves or any person from the workplace violence, the worker should contact the police, dial 911.
- To participate in training regarding the Violence and Harassment Prevention Policy and this Program and Company procedures directed at ensuring a workplace free of harassment and discrimination and procedures directed at workplace violent risks.
- Endorse DSS Inc Acknowledgement of Receipt and Understanding of Violence and Harassment Prevention Policy and Program and acknowledgment of training in the Policy and Program and/or such policy where business occurs.
- Participate in/if required in the “Risk Assessment for Workplace Violence Prevention Form” which is a requirement and part of DSS Inc policy and program.

### **3.4 Joint Health and Safety Committee/Representatives**

- Provide, review, assist with completion of Workplace Assessments and be able to recognize risks of workplace violence hazards in the course of carrying out regular functions as inspecting workplaces where DSS Inc business occurs.

### **4.0 Domestic Violence**

Any employee experiencing violence outside of the workplace (i.e domestic violence) that may create a risk of danger to themselves or others in the workplace is encouraged to report such violence so that the Company can take reasonable preventive steps.

### **5.0 Workplace Violence Risk Assessment**

DSS Inc is committed to a process of assessing workplaces for risks of workplace violence that may arise from the nature of the workplace, the type or work or the conditions of work. Existing/New workplace risk assessments will be updated annually, but not limited to upon review of the Workplace Violence and Harassment Prevention Policy and Program.

Completed risk assessment documents will be provided to the DSS Inc Joint Health and Safety Committee.

Information from Workplace Violence Risk Assessments shall be utilized to establish policies and procedures to control the risks, including: measures for summoning immediate assistance; parking lot safety and security; lighting of buildings, access and egress area in parking lots; entry and security; measures for workers who may be working alone, amongst other matters.

### **6.0 Reporting, Problem Resolution, and Investigation Processes-Harassment and/or Discrimination**

Incidents and complaints of harassment or discrimination are serious matters that will be investigated by DSS Inc which favors resolving any situation or conflict promptly, in a manner that is fair to and respectful of all parties involved. If it is possible to resolve a situation involving harassment or discrimination by coaching, counseling or facilitation to resolve an issue and prevent a situation from escalating to a formal complaint, this is desirable. Assistance is always available from the Staffing Coordinators of DSS Inc (416-759-1500) or from John Bumpus, President of DSS Inc for advice and for ensuring it is made known immediately to an alleged harasser that his or her behavior is unwelcome, offensive, and contrary to DSS Inc Policy and Program.

For clarity, harassment or discrimination under the DSS Inc Harassment Policy and Program does not include reasonable action or conduct that is part of the day to day work function (i.e changes in work assignments, scheduling, job assessment and evaluation, workplace inspections, implementation of dress codes and disciplinary action) by DSS Inc Staffing Coordinators, Management or

Supervisors where DSS Inc business occurs in managing the workplace, or differences of opinion or minor disagreements.  
(Continued)

An incident or complaint that cannot be resolved as above shall be reported to John Bumpus- President of Direct Staffing Solutions, Inc or the designated JHSC(Joint Health and Safety Worker Member)416-759-1500. The incident or complaint will be recorded in writing.

If an employee is involved in a complaint of harassment or discrimination, the investigation will be conducted as quickly and as confidentially as possible. Complete confidentiality is not possible in all circumstances and cannot be guaranteed.

If an incident of harassment or discrimination involves a person who is not an employee of DSS Inc, DSS Inc Management or designated JHSC Member will report the incident to that person's employer and/or such other person(s) as DSS Inc determines is appropriate in the circumstances.

At the conclusion of the investigation into the incident or complaint, DSS Inc Management or JHSC Member will prepare a report of the findings, and make any suggestions to prevent a reoccurrence. Where a DSS Inc employee is involved, disciplinary action may occur. The severity of any disciplinary action, which may include dismissal from employment, will be consistent with the seriousness of the conduct.

## **7.0 Reporting, Problem Resolution, and Investigation Processes- Violence in the Workplace**

Incidents and complaints of workplace violence are serious matters that will be investigated by DSS Inc. All employees subjected to or who witness an incident of workplace violence should follow this process for reporting workplace violence.

- All incidents of workplace or reprisal must be immediately reported to the designated workplace Supervisor or Management and to John Bumpus, President of DSS Inc.416-759-1500 during hours of 7am-6pm or 905-424-3403 during non working hours or to DSS Inc JHSC Worker Member.416-759-1500.
- All complaints and incidents are to be recorded in writing by the reporting person/employee and provided to John Bumpus President of DSS Inc, include the date, time, location, potential witnesses and nature of the incident in the report.
- If the police have not previously being summoned, the Manager or DSS Inc Management will report all incidents of workplace violence to police.
- If an incident of workplace violence involves a person who is not an employee of DSS Inc, DSS Inc Management or designated JHSC Member will report the incident to that person's employer and/or such other person as the Company determines is appropriate in the circumstances.

If an employee is involved in an incident of workplace violence, the investigation will be conducted as quickly and as confidential as possible. Complete confidentiality is not possible in all circumstances and cannot be guaranteed. If a complaint against a DSS Inc employee is substantiated, DSS Inc Management will take necessary disciplinary actions. The severity of any disciplinary action, which may include dismissal from employment, will be consistent with the seriousness of the conduct at issue, such that more significant discipline will follow more serious conduct or repeated violence of this policy.

Conclusion of the investigation into the incident or complaint, Management of DSS Inc will prepare a report to the findings and make any suggestions to prevent a reoccurrence.

## **8.0 Assistance to Victim(s)**

DSS Inc will ensure that employee(s) affected by an incident of workplace violence is advised to and supported in consulting health professionals if an injury or adverse symptom is experience by the employee.

## **9.0 Reports to Health and Safety Authorities**

Management shall notify a **Ministry of Labour** Inspector, the **JHSC**(Joint Health and Safety Committee)within four (4) days, and shall notify the Workplace Safety and Insurance Board within three (3)days, after learning of an accident to an employee arising from workplace violence, if the accident necessitates healthcare or results in the employee not being able to earn full wages. In the event of an incident of workplace violence resulting in fatal or critical injury, the Ministry of Labour, the JHSC will be notified immediately and will receive a report required by law within two (2) days.