



Huron-Perth  
Children's Aid Society



2025-2028

# EQUITY PLAN



## LAND ACKNOWLEDGEMENT

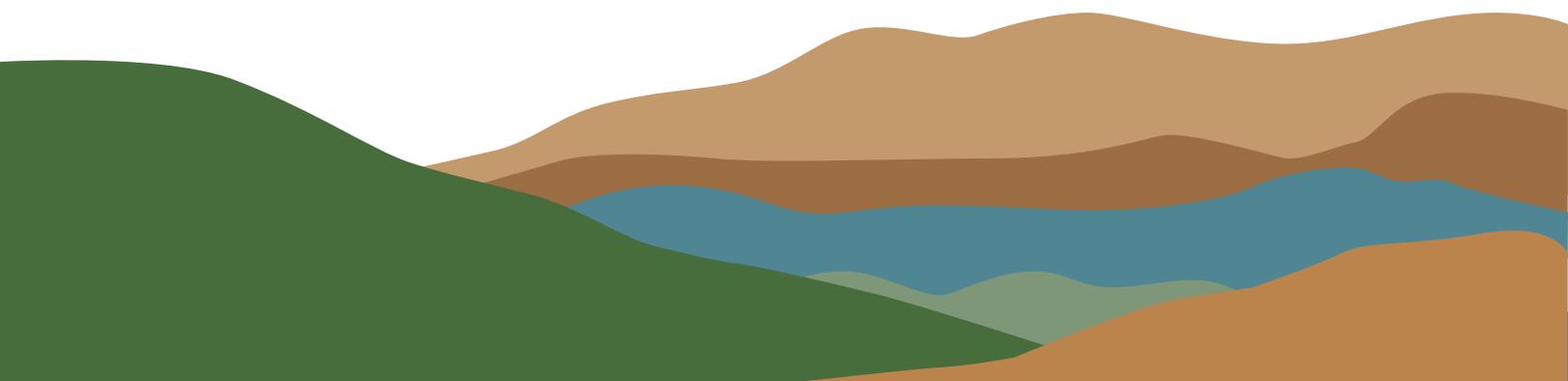
The Huron-Perth Children's Aid Society acknowledges the territory on which it operates as the traditional territory of the Haudenosaunee, Anishinaabe, and Attawandaron peoples. We recognize the First Peoples' continued stewardship of the land and water, and that this territory was subject to the Dish with One Spoon Wampum, under which multiple nations agreed to care for the land and resources located by the Great Lakes. We acknowledge and recognize the Upper Canada Treaties signed regarding this land, Treaty 29 (The Huron Tract) and Treaty 45.5 (The Saugeen Tract), and our role as treaty people, committed to moving forward in the spirit of reconciliation, gratitude, and respect with all First Nations, Métis, and Inuit people.

We acknowledge the racist and oppressive role that child welfare has played in the past, the impact of the Residential school system, and the impact they have had on Indigenous communities. We also acknowledge that First Nations, Inuit, and Métis families have been particularly harmed by the actions of child welfare in the past, with legislation and practices that continue today.

The Huron-Perth Children's Aid Society is committed to implementing the Truth and Reconciliation Calls to Action, especially related to child welfare. We commit to ongoing action to reform our practice and support improved outcomes for Indigenous communities.

We must all remember our responsibilities to First Nations, Inuit, and Métis people as we are all Treaty Peoples. We dedicate ourselves to recognizing settler privilege and colonialism, disrupting these cycles, and respecting Indigenous rights to protect land, treaties, and communities.

The Huron-Perth Children's Aid Society is committed to the Truth and Reconciliation process and journey to support and promote Indigenous wellbeing.



# TABLE OF CONTENTS

<b>2</b>	NOTE OF THANKS INTRODUCTION TO THE EQUITY PLAN OVERVIEW OF THE PROCESS ACTION PLAN
<b>3</b>	EXECUTIVE SUMMARY
<b>4</b>	2022-2025 HPCAS STRATEGIC PLAN
<b>5</b>	SERVICE USERS ACTION PLAN
<b>6</b>	STAFF ACTION PLAN
<b>9</b>	COMMUNITY ACTION PLAN
<b>10</b>	SAFE SPACES TO BRAVE SPACES
<b>11</b>	APPENDIX A Anti-Harassment and Discrimination Statement
<b>12</b>	APPENDIX B Workplace Violence, Discrimination and Harassment Procedure
<b>16</b>	Workplace Violence, Discrimination and Harassment Complaint Intake/Report Form

# EVERYONE IS WELCOME HERE

## NOTE OF THANKS

We extend our heartfelt gratitude to the KOJO Institute for their comprehensive assessment and insightful recommendations. Their dedication and expertise have provided us with a clear path forward in our journey toward becoming an equity-informed organization. We also thank all HPCAS staff and stakeholders who participated in the assessment process, sharing their experiences and perspectives to help shape this Equity Plan.

## INTRODUCTION TO THE EQUITY PLAN

The Equity Plan is designed to guide HPCAS on its journey toward becoming an equity-informed organization. It builds on the equity work already underway and provides a strategic roadmap for organizational change. The plan is informed by the KOJO Institute's PEEEC Framework, which emphasizes the importance of being responsive to data, preventing and responding to inequity, mitigating power imbalances, and engaging employees' skills and knowledge.

## OVERVIEW OF THE PROCESS

The development of the Equity Plan involved a thorough assessment of HPCAS by the KOJO Institute, including focus groups, key informant interviews, and a staff survey. The assessment identified key areas where HPCAS could take further steps toward building a sustainable culture of equity. The recommendations were made based on the data collected and the insights provided by HPCAS staff and stakeholders.

## ACTION PLAN

The Equity Plan includes specific and tailored actions to address the issues raised in the assessment.

# EXECUTIVE SUMMARY

The Huron-Perth Children's Aid Society (HPCAS) is committed to creating an environment of equity and inclusion, ensuring that every individual can work and receive services with dignity and respect. This commitment is reflected in our 5-year Strategic Plan, which emphasizes equity as one of our core value pillars. Despite our efforts, the organizational assessment conducted by the KOJO Institute revealed significant barriers to equity within HPCAS, including interpersonal racism, client-related racism, systemic racism, and organizational barriers to equity.

The assessment identified four key themes:

**INTERPERSONAL RACISM:** Manifested through overt racism, microaggressions, differential treatment, and a culture of whiteness.

**CLIENT-RELATED RACISM:** Racism directed toward HPCAS staff from clients and stakeholders, and discriminatory impacts on racialized/Indigenous clients.

**SYSTEMIC RACISM:** Lack of racial diversity among staff, particularly at leadership levels, and potential retention deficits linked to discrimination and isolation.

**ORGANIZATIONAL BARRIERS TO EQUITY:** Inadequate addressing of incidents of workplace racism, a culture of fear/fear of reprisal, reluctance toward equity among some staff, leadership equity challenges, and equity burdens for racialized/Indigenous employees.

The Equity Plan outlines specific actions to address these issues, focusing on policy/procedures/proclamations, education, establishing targets, enforcement, and corrections/consequences.



# STRATEGIC PLAN

Our Mission is to advocate for and protect children's rights; to support and strengthen families; and to be leaders for positive change in our community.

## EQUITY



## EMPOWERMENT



## ENGAGEMENT



### — SERVICE USERS —

The culture, diversity, identity, and heritage of service users are acknowledged and respected. The agency provides an inclusive barrier-free range of services.

Service users engage in self-advocating opportunities and decision making, resulting in meaningful and individualized support.

Service users will engage with the agency and community through active decisions, building lifelong connections and interacting with society activities, resulting in promotion of sustainable positive outcomes.

### — STAFF —

Staff strive to continually lead and model equity and celebrate diversity and inclusion throughout the organization. We engage in an inclusive workplace by bringing our full selves into the organization.

Informed decisions are made with confidence and in alignment with the specific roles of staff, resulting in a positive influence within the organization.

Through continuous learning staff are confident, enthusiastic, and active members in the creation and delivery of positive outcomes for service users, the community, and the agency.

### — COMMUNITY —

Our leadership within the community and alongside our community partners reflects the principles of diversity, equity, and inclusion. Planning and decision making reflects the input of our stakeholders.

Meaningful community partnerships are developed through shared decision making and ongoing communication. Opportunities to share resources and increase community capacity allow us to best serve our children and families.

We will develop proactive partnerships that will collectively advocate for the safety and wellbeing of children and families.



**Huron-Perth**  
Children's Aid Society

**SAFE CHILDREN.**  
**CONFIDENT YOUTH.**  
**RESILIENT ADULTS.**

# SERVICE USERS ACTION PLAN

**GOAL:** The culture, diversity, identity, and heritage of service users are acknowledged and respected. The agency provides an inclusive barrier-free range of services.

## IDENTITY-BASED DATA:

- Develop and create procedures and processes to comply with Part X of the CYFSA section 12, pursuant to section 72 to enact how agencies collect Identity-Based Data (IdBD), and how we use it to address discrimination, disproportionalities, and disparities.
- Collect Identity-Based Data (IdBD) in alignment with our procedures and processes. Plan how each area (service, HR, and Finance) will use data intelligence to inform our service and organizational plans.
- Consistently use Identity-Based Data (IdBD) to ensure the equitable allocation of resources by developing methods and processes to calculate expenditures for Indigenous and Black service recipients and comparing to overall expenditures.
- Identify the number of open files and legal files involving First Nations, Inuit, and Métis children and families and develop, in partnership with service, concrete plans to reduce the number, and time that families are involved with child welfare services.
- Increase the use of Customary Care for First Nations, Inuit, and Métis children and youth.
- Monitor and evaluate the effectiveness of inclusive practices within our organization, honoring our Indigenous Commitments, and supporting staff and service recipients.
- Establish clear expectations across the entire Agency on centering Truth and Reconciliation and equity in all aspects of our work. This will be achieved through annual performance appraisals that include the goals related to Truth and Reconciliation, diversity and inclusion. Job profiles will clearly outline the expectations around Truth and Reconciliation, diversity and inclusion.
- Eliminate the disproportionalities and disparities of FNIM and Black children and youth at our Agency.
- Develop workplan to review procedures and processes from an equity lens.
- Review both internal and external complaint mechanisms to ensure investigations into complaints of discrimination are addressed quickly and thoughtfully.
- Review files through a lens of equity and Truth and Reconciliation. Ensure that legal and service documents reflect a child or family's identified name and pronouns.
- Aggregate data of referrals by identity.
- Collect data on referral sources (police, schools, hospitals etc.), including self-referrals over time. Follow up and education with high-reporting sources.
- Tracking of reasons for service for identified groups.
- Surveys regarding service barriers experienced by service users.
- Develop and publicize mechanisms within HPCAS website, social media account, create survey link, and consider third party where appropriate, for clients and service users to report complaints about racism or discrimination based on any grounds to HPCAS and include an explanation of how these will be addressed.

# STAFF ACTION PLAN

**GOAL: Staff strive to continually lead and model equity and celebrate diversity and inclusion throughout the organization.**

- Implement mandatory Indigenous awareness training and ongoing learning sessions within our organization offered by facilitators who identify as First Nations, Inuit, or Métis and/or other Indigenous groups with content written through an Indigenous worldview.
- Create a mentorship program for racialized staff to assist with succession planning for leadership roles (e.g., One Vision One Voice's African Canadian Leadership Mentorship Program created to address agencies' organizational culture, cultivate leadership skills, and guide the professional development of African Canadian staff). Create a process for leadership identification and support, including courses and professional development opportunities.
- Ensure Accessible Workplace Requirements are embedded in our organization according to AODA Standards. Review AODA standards and cross-reference back to Agency compliance.
- Develop an equitable recruitment plan and selection process that mitigates bias and enhances best practices.
- Create a baseline for recruitment and succession planning where there is a requirement for candidates to have demonstrated commitment to reconciliation practice and competencies as a core practice.
- Integrate core equity and reconciliation competencies into our recruitment/outreach, hiring plans, and staff performance measures.
- Arrange skills-based training in cultural safety, anti-Indigenous racism, Indigenous rights, conflict resolution methods, and allyship.
- Create a self-evaluation process for all staff to measure their awareness and application of anti-racism/anti-hate/anti-oppressive practices. Incorporate this process into supervision.
- Allocate appropriate funding to meet the daily needs of Black children and youth in care, including providing culturally appropriate foods, skin care products, hair care products and services, books, toys, and other resources. This will include ear-marked funds to purchase culturally appropriate items and funding a supply of products to maintain inventory for Black children and youth in care to access.
- Establish core equity values in staff probationary reviews and annual performance reviews.
- Support substantive funding for First Nations children when allocating resources for products, services, and supports as per Jordan's Principle. This can mean funding supports/activities not traditionally funded.
- Adequately resource equity initiatives within our agency – for example, purchase culturally appropriate services from Indigenous-led community organizations and service providers, support 2SLGBTQ+ children and youth in care to meet their identity needs.
- Complete annual Metrics at Work Survey that includes questions about organizational demographics, individual demographics, and personal experiences in the workplace. Use the results of the survey to inform future employment equity plans.
- Embed a Land Acknowledgement as foundational to the reconciliation journey.

- Review and examine physical sites with an equity lens and develop a project list for changes.

---

- Create an internal equity committee from a decolonizing approach to inform our agency's operations and service. Ensure the committee has a direct line of communication to Executive Leadership.

---

- Review files through a lens of equity and Truth and Reconciliation. Ensure that legal and service documents reflect a child or family's identified name and pronouns.

---

- Collaborate with community organizations to establish Affinity Groups for racialized staff members. Partnering with other agencies in Huron and Perth regions (hospital, school, police, community workers) for peer support.

---

- Collaboration between leaders on ways to address systemic and community-based racism. Feedback loop between Affinity Groups and leadership.

---

- Obtain a set of counsellors, therapists from different identities to provide support to staff in need.

---

- Arrange equity based services, so people do not need to go through leadership. Attach services to the EAP program with ability to do virtual.

---

- Ensure access to a crisis line for staff.

---

- Present anonymized KOJO presentation to staff.

---

- Embed equity training into onboarding (KOJO videos).

---

- Learner profiles/tracking system of staff training and what has been completed.

---

- Determine and deliver mandatory equity training on an annual basis.

---

- Equity is an agenda item for Monthly Team/ELT/LT Meetings. ERC will recommend monthly videos for team meetings.

---

- Celebrate Monthly Commemorative and Significant Dates by Teams.

---

- Consistent - Child Welfare Stories, Videos, Awards/Rewards, Stories. Encourage sharing of information by CASi, Email, recommendations.

---

- Have conversations at Leadership Team about how to deliver and have equity related conversations.

---

- Interviewing
  - > Review interview questions and ensure they elicit conversation and assessment of equity based and anti-racist lens.
  - > Create answer keys for interview questions.

---

- Develop data collection mechanisms to enable tracking of equity-seeking employee experiences and outcomes throughout the employee lifecycle, including the distribution of career growth opportunities and overall rates of progression, retention, and merit/salary distribution.
  - > Conduct survey for staff at different intervals of employment
  - > Schedule exit and stay interviews

---

- Career Supports
  - > Create a framework for leadership identification and professional development opportunities.
  - > Involve the Growth and Development Coach with supporting career growth opportunities, trainings, and experiences.
  - > Create a roster of equity committed mentors/managers for newly hired Black, Indigenous and racialized staff.

---

- Substantially update the Workplace Discrimination and Harassment Prevention Procedure and Program so that it outlines clear roles, responsibilities, steps, and timelines for addressing discrimination complaints; develop and share frameworks for corrective action, including for reprisals against those who raise concerns about racism. Refer to KOJO Report, but specifically:
  - > Conduct a critical analysis of existing policy
  - > Update language within policy
  - > Include language about the culture, safety, and well-being of staff and what this means at all levels.
  - > Clearly identify reporting systems for staff
  - > Clarify and communicate redress options (education, mediation, "strike system", termination etc.)

---

# STAFF ACTION PLAN

- Support a culture that encourages employees to come forward with discrimination concerns/complaints by noting how this helps HPCAS to move toward full equity; include in this messaging a commitment to ensuring there is no correlation between raising concerns and lack of career progress.
  - > Building confidence through accountability, follow through, and consistency.
  - > Acknowledgement of power dynamics, building trust through action and experience.

---
- Develop discipline expectations
  - > While an educative and restorative justice approach is a first choice, in some cases, where respondents engage in repeated, direct, and/or egregious discrimination with no or little remorse, HPCAS should impose substantive discipline, up to and including termination when appropriate.

---
- Role-specific harassment/discrimination free workplace
  - > Embed equity into onboarding plan.
  - > Promote ongoing self-directed learning, learner profiles.
  - > Assessed during performance reviews.

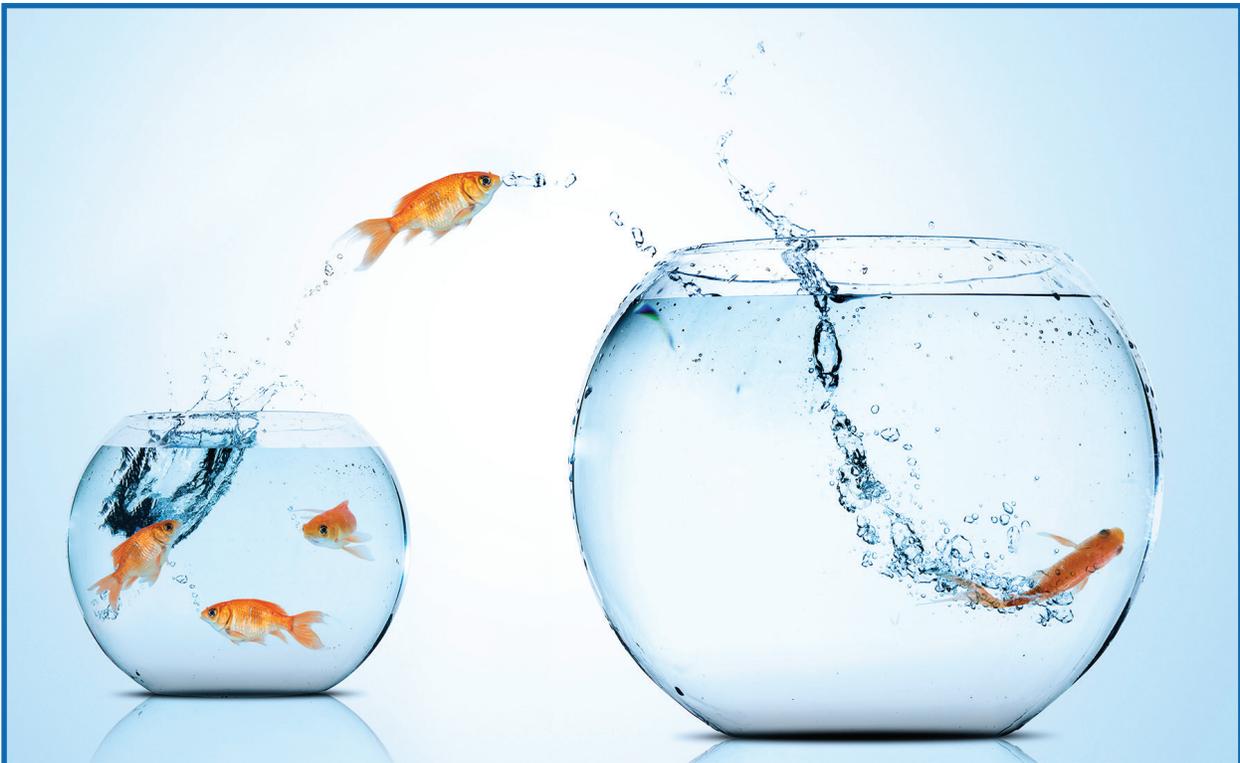
---
- Brief HPCAS managers on the KOJO report findings to build a shared understanding of the specific manifestations of racism within the workplace and its harmful personal and organizational impacts

---

# COMMUNITY ACTION PLAN

**GOAL:** Our leadership within the community and alongside our community partners reflects the principles of diversity, equity, and inclusion. Planning and decision making reflects the input of our stakeholders.

- Build relationships with racialized and marginalized communities - specifically Indigenous, Black, and 2SLGBTQ+.
- Support and be aware of Indigenous services in partnership with local Indigenous agencies and communities. This includes working with Indigenous Peoples and organizations to build a network of support for Indigenous children, youth, and families.
- Ensure that all community-facing information sources align with the Calls to Action.
- Support cultural continuity and ensure agency alignment with C-92.
- Recruitment of Resource parents who identify LGBTQ2s+; racialized, and Indigenous. This includes partnerships and reach out to community organizations that are connected with the identified groups.
- Identify and increase the diversity of Board of Directors through an inclusive Board recruitment and retention strategy, including representation from those with lived experience.
- Continue to make regular public and open statements of solidarity with racialized and oppressed communities to build a shared understanding among all levels of the organization of the definition and origins of racism and staff's responsibilities for combatting it and addressing it in the workplace and empowering staff to talk about why we are doing this work.
- Provide clear signage outlining that harassment and discrimination will not be tolerated in HPCAS buildings and/or on service sites. Including "Everyone Belongs Here" signs, clear postings specific to harassment and discrimination of any form, expectations related to staff pods/ community areas in the agency.
- Joint ongoing equity training with other organizations.
- Community engagement sessions for different communities (Indigenous, Black, Pride)
- Create online surveys to encourage and support partnerships with an input from racially diverse communities about HPCAS programs and services.
- Feedback/suggestion mechanism linked to website
- Invitations to racially diverse communities for joint events.
- Attendance of HPCAS at diverse community events.
- Reach outs and intentional meetings with community partners to support partnerships and gather input.
- Recruitment - Build relationships with existing community groups and organizations.
- Recruitment - Consult with an Equity and Inclusivity Advisory Committee
- Recruitment - Attend job fairs for recruitment opportunities.
- Recruitment - Invoke third party help where appropriate.



## SAFE SPACES TO BRAVE SPACES

Agree to Disagree

Controversy with Civility

No Personal Attacks

Distinguish between  
Lived Experiences and People

Don't Take Things Personally

Support Colleagues and Yourself

Assume the Positive Intent

Own Your Intentions  
AND Your Impact

Respect Others

Controversy with Civility

Comfortability

Lean into  
Necessary Conversations

## Anti-Harassment and Discrimination Statement

### Our Commitment

Huron-Perth Children's Aid Society (HPCAS) is committed to providing a safe, inclusive, and respectful environment for all individuals. We have a zero-tolerance policy for harassment and discrimination of any kind, including but not limited to race, ethnicity, gender, age, disability, sexual orientation, religion, or national origin. At HPCAS, we believe that everyone deserves to be treated with dignity and respect. We are dedicated to fostering a culture of equality and fairness, where every person feels valued and empowered.

### Prohibited Conduct

**Harassment:** Any unwelcome behavior, verbal or physical, that creates an intimidating, hostile, or offensive environment.

**Discrimination:** Any unjust or prejudicial treatment of individuals based on their protected characteristics.

### Consequences

Violations of this policy will result in appropriate disciplinary action, which may include suspension or termination of access to HPCAS facilities and services.

### Reporting Procedures

Your well-being and safety are a top priority. If you experience or witness any form of harassment or discrimination, we encourage you to report it immediately. Confidentiality will be fully maintained where possible, and reprisal against individuals who report misconduct will not be tolerated.

To report incidents please visit our website [www.h-pcas.ca](http://www.h-pcas.ca) and fill out the form under the Anti-Harassment and Discrimination page or scan the QR code below.

### Support and Resources

We offer support and resources to those affected by harassment or discrimination and are committed to addressing and resolving any issues promptly and effectively. Together, we can create a welcoming and supportive community for all.

Thank you for your cooperation and commitment to upholding these values.



**SAFE CHILDREN. CONFIDENT YOUTH. RESILIENT ADULTS.**  
*To advocate for and protect children's rights; to support and strengthen families; and to be leaders for positive change in our community.*

Scan to report an incident



# APPENDIX B

<b>Category:</b>	Workplace Harassment	<b>Section:</b>	2
<b>Approved by:</b>	Executive Director	<b>Code:</b>	2.9-1.0
<b>Effective Date:</b>	September 1, 2022	<b>Review Date:</b>	October 29, 2024 (annually)
<b>Board Policy Reference:</b>	1.2.7 Discrimination, Bullying and Related Behaviours 1.2.9 Equity 1.4.7 Health and Safety		
<b>Cross – References:</b>	2.8-1.0 Conduct and Progressive Discipline 2.11-1.0 Health & Safety		

## Workplace Violence, Discrimination and Harassment Procedure

### Preamble:

The Huron-Perth Children's Aid Society (hereinafter referred to as HPCAS) is committed to fostering a safe and respectful workplace free from violence, discrimination and harassment. This standard and procedure are established to ensure this organization's compliance with the Occupational Health and Safety Act, the Ontario Human Rights Code, and other applicable legislation and regulations. HPCAS will operate in a manner that prevents and protects employees from violence and harassment, as well as discrimination or harassment based on race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability – all known as protected grounds.

This standard and procedure applies to all HPCAS Board members, employees, students and volunteers, and includes violence, discrimination and harassment as experienced from all other employees, service recipients and members of the public, when it occurs in relation to their work. Everyone is expected to uphold this standard and procedure and to work together to prevent workplace violence, discrimination and harassment.

### Definitions:

**Complainant:** The individual who makes a complaint of workplace violence, discrimination or harassment.

**Domestic Violence:** is considered workplace violence when 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 – may physically harm, or attempt or threaten to physically harm, that worker at work (MOL, 2016, p. 8).

**Discrimination:** means not individually assessing the unique merits, capacities and circumstances of a person; instead, making stereotypical assumptions based on a person's presumed traits; and having the impact of excluding persons, denying benefits or imposing burdens (Ontario Human Rights Commission). Discrimination may (OHRC, 2013, p. 13):

- be intentional or unintentional;
- involve direct actions that are discriminatory of their face;
- involve rules, practices or procedures that appear neutral, but disadvantage certain groups of people; and
- take obvious forms, or it may happen in very subtle ways.

**Protected Grounds are:** race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy and breastfeeding), sexual orientation, gender identity, gender expression, age, record of offences, marital status (including single status), family status or disability (OHS, s. 5(1)).

**Reprisal:** Any adverse action taken against an individual for filing a complaint or participating in an investigation of violence, discrimination or harassment.

**Respondent:** The individual against whom a complaint of workplace violence, discrimination or harassment is made.

**Staff (Worker):** for the purposes of this standard and procedure, is defined as an HPCAS Board member, employee, student, or volunteer.

**Workplace:** means any land, premises, location or thing at, upon, in or near which a worker works (OHS, s. 1(1)). This may include, but not limited to: Society offices, virtual workspaces, virtually through the use of information and communications technology, parking lots, locations of organized agency events, training locations, service recipients homes, and during business related travel.

**Workplace Violence:** means 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; or 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 (OHS, s. 1(1)). Examples of workplace violence include (MOL, 2016, p. 7):

- 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.

**Workplace Harassment:** engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome, including sexual harassment (OHS, s. 1(1)). Examples of workplace harassment include (MOL, 2016, p. 8):

- comments, remarks, jokes, or innuendos that demean, ridicule, intimidate, or offend;
- bullying or aggressive behaviour;
- displaying or circulating offensive pictures or materials in print or electronic form;
- inappropriate staring;
- repeated offensive or intimidating phone calls or e-mails;
- isolating or making fun of a worker because of gender identity.

**Workplace Sexual Harassment:** means 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 (OHS, s. 1(1)). Examples of workplace sexual harassment include (MOL, 2016, p. 10):

- asking questions, talking, or writing about sexual activities;
- rough or vulgar humour or language related to sexuality, sexual orientation or gender;
- displaying or circulating pornography, sexual images, or offensive sexual jokes in print or electronic form;
- leering or inappropriate staring;
- invading personal space;

- unnecessary physical contact, including inappropriate touching;
- demanding hugs, dates, or sexual favours;
- making gender-related comments about someone's physical characteristics, mannerisms, or conformity to sex-role stereotypes;
- verbally abusing, threatening or taunting someone based on gender or sexual orientation; or
- threatening to penalize or otherwise punish a worker if they refuse a sexual advance.

### Standards:

1. HPCAS will maintain a workplace violence, discrimination and harassment prevention program that includes:
  - a. Designation of the Director of People and Culture as responsible for overseeing the program.
2. All staff are expected to work together to prevent and to not commit workplace violence, discrimination or harassment, and follow the procedures within.
3. HPCAS will take reasonable steps to prevent and protect staff from workplace violence, discrimination and harassment.
4. HPCAS will take seriously and investigate all complaints of workplace violence, discrimination or harassment in a manner that is timely, fair and addresses all relevant issues. All staff are expected to cooperate fully in any investigation.
5. Staff who have acted in good faith will not be penalized or experience reprisal from anyone for making a complaint of an incident or participating in an investigation related to workplace violence, discrimination or harassment.
6. The information about a complaint, report or confirmed incident of workplace violence, discrimination or harassment will not be disclosed except to the extent necessary to protect staff, to investigate the complaint or incident, to take corrective action, as required by law, or only as otherwise described in the procedures within.

### Procedures:

#### Prevention Program

1. HPCAS will make known to its staff that it has appointed the Director of People and Culture to oversee the workplace violence, discrimination and harassment prevention program.
2. The Director of People and Culture or their designate, will conduct and maintain an assessment of the risks of workplace violence that may arise based on the nature, type and conditions of work by all staff, considering circumstances that would be common to HPCAS as well as to similar workplaces, and re-assess at minimum annually, or earlier such as when the workplace environment changes, there are significant changes in the type or conditions of work, there is new information on the risk of workplace violence, or a violent incident indicates a risk not previously identified (OHSA, s. 32.0.3(1,4); MOL, 2016, p. 16), and then:
  - a. provide a written copy of the assessment, or re-assessment, to the Joint Health and Safety Committee and consider any feedback (OHSA, s. 32.0.3(3)(a); s. 32.0.3(5)),
  - b. if applicable, revise the procedures within to control any of the risks identified as likely to expose a worker to physical injury (OHSA, s. 32.0.2.(2)(a); s. 32.0.3(1-2)), and then
  - c. provide a written copy of the final assessment, or re-assessment, to all staff so that they are aware of the workplace violence risks within the workplace, and have them all review and attest to the revised standard and procedure, if applicable.
3. The Director of People and Culture or their designate, will annually conduct a barrier review in relation to the Ontario Human Rights Code, and develop a plan to remove any identified barriers (OHRC, 2013, pp. 7-8).
4. This standard and procedure will be reviewed at minimum annually by the Executive Leadership Team, who will consult and seek input from the Joint Health and Safety Committee and others as required, prior to approval (OHSA, s. 32.0.1(1)(c)).
5. All staff are required to review and attest to this standard and procedure annually, following the above approval (OHSA, s. 32.0.8). A copy will be made available electronically and one copy will also be made available on the Health and Safety Board in each of the physical offices (OHSA, s. 32.0.1(2)).
6. The Joint Health and Safety Committee will develop annually a training plan that supports raising awareness of and the prevention of workplace violence, discrimination and harassment, as well as organizing and posting information and resources on the HPCAS intranet and throughout each of the physical offices.
7. The Director of People and Culture or their designate, will provide new staff with orientation and training to the HPCAS workplace violence, discrimination and prevention program, as soon as possible upon commencing their role, and also provide them a copy of this standard and procedure.
8. The Director of People and Culture or their designate, may conduct exit interviews when staff retire, resign, or are transferred or terminated, to help identify potential workplace violence, discrimination or harassment related experiences or problems. If conducted, the Director of People and Culture will share annually, a non-identifying summary that highlights any themes or trends, with the Joint Health and Safety Committee, with the purpose of helping inform the annual training plan.
9. All staff are encouraged to consult with their Manager or the Director of People and Culture if they have any questions or concerns in relation to this standard and procedure, or about workplace violence, discrimination or harassment.

### Workplace Violence Prevention

#### Training

10. HPCAS will provide regular training in relation to workplace violence prevention, including how to manage a person who may become aggressive or violent. Training should occur sooner if there are significant changes to the risks encountered or to the standards or procedures, or if additional training is identified as needed due to procedures not being followed or staff are indicating they are not familiar with them (MOL, 2016, p. 19).

#### Risks and Safety Planning

11. If a staff becomes aware that workplace violence (including domestic violence), that would likely expose themselves or another staff to physical injury may occur in the workplace, that staff will report this to their Manager/Director, or otherwise the Director of People and Culture.
12. When a risk of workplace violence has been identified by a staff, the staff, Manager/Director, and if requested, the Director of People and Culture and/or a representative of the Union, will be jointly responsible for the development of a safety plan that considers the following (OHSA, s. 32.0.4):
  - a. the potential risk factors and anticipated violent behaviour,
  - b. the potential locations within the workplace where workplace violence is likely to occur,
  - c. if consultation should occur with police, the courts or other organizations who may already be involved to help inform the plan,
  - d. what information other staff may need to reasonably know to help support a plan,
  - e. what information (and not more than is reasonable necessary) other staff have a right to know as it relates to a risk of workplace violence that is likely to expose them to physical injury and for which they would likely encounter the violent person in the course of their work (OHSA, s. 32.0.5(3-4)),
  - f. who is responsible for what, and
  - g. actions should the person of concern attend the workplace or engage in workplace violence at the workplace.
13. Those involved in the development of the plan will also make a decision about where the plan will be documented and who will receive a copy or get access to it.
14. The Manager/Director, or otherwise the Director of People and Culture or their designate, will then immediately communicate only what is minimally necessary, to those identified in the plan as requiring this information, to help implement it or to help protect against their own personal safety.

### Other Prevention Procedures

15. HPCAS will maintain secure access to areas of the physical offices where staff normally work. Where a workplace violence risk has been identified about a non-staff, they will not be permitted to secure areas of HPCAS offices, unless approved by a Manager and a safety plan is in place.
16. All staff who may be visiting with service recipients in their homes will receive an agency cell phone.

### Workplace Discrimination and Harassment Prevention

17. HPCAS will provide regular training in relation to workplace discrimination and harassment prevention, or sooner if there are significant changes to the risks encountered or to the standards or procedures, or if additional training is identified as needed due to procedures not being followed or staff are indicating they are not familiar with them (MOL, 2016, p. 35).

### Emergency Response (required under OHSA, s. 32.0.2(2)(b))

#### Workplace Violence Emergency Response

18. For all incidents of workplace violence, including where there is an immediate safety concern or risk of workplace violence based on a threat, police are to be contacted immediately, and then a complaint/report will be made as per the procedures within.
19. In the event of critical injury or death of a staff due to workplace violence, the following will be completed in this order or otherwise concurrently (MOL, 2016, p. 25):
  - a. immediate call to 911,
  - b. immediate call to the Ministry of Labour, Immigration, Training and Skills Development's Health and Safety Contact Centre at 1-877-202-0008 (operates 24/7),
  - c. immediate call to the Union President,
  - d. immediate notification to the Joint Health and Safety Committee,
  - e. within 48 hours, notification in writing to, the Ministry of Labour, Immigration, Training and Skills Development, the Union President, and the Joint Health and Safety Committee.

### Workplace Discrimination and Harassment Emergency Response

20. For all incidents of workplace discrimination or harassment where there is an immediate concern to a staff's wellbeing, the Director of People and Culture or their designate should be contacted immediately.

### Work Refusal due to Workplace Violence

21. The workplace refusal process allows workers to refuse unsafe or dangerous work to their direct Manager if they have a reasonable cause to believe it poses an immediate, imminent, or serious threat to health or safety.

### Support for Staff

22. HPCAS will provide all employees access to an Employee Assistance Program (EAP) to support the wellbeing of all employees and their families and will make this information easily accessible by posting this information on the HPCAS intranet and throughout each of the physical offices. New employees will also be provided this information at the time of hire.
23. In the event of a complaint of workplace violence, discrimination or harassment, employees will be reminded about the EAP and provided instructions, either immediately, or at least as soon as reasonably practical, on how to access it.

### Protection from Reprisal

24. Anyone who engages in reprisal of a staff who has made a complaint or participated in an investigation in relation to workplace violence, discrimination or harassment, will be subject to the HPCAS' Conduct Progressive Discipline standard and procedure.

### Commitment to Equity/Anti-Oppression/Anti-Racism

25. HPCAS is committed to reviewing complaints and conducting investigations using an Equity, Anti-Oppression, and Anti-Racism lens.

26. HPCAS will also maintain an external list of workplace harassment and discrimination investigation experts, that have expertise in the above lens', who may be consulted if required, during the review of a complaint or during an investigation. Consultation will be at the discretion of the Director of People and Culture or their designate.

### Complaints and Reports (required under OHSA, s. 32.0.2(2)(c)), s. 32.0.6(2)(c))

27. All suspected or known incidents of workplace violence, discrimination and harassment are to be reported immediately.
28. All complaints and reports of workplace violence, discrimination and harassment will be made in writing utilizing the, using the Workplace Violence, Discrimination and Harassment Complaint Form.
29. Complaints and reports will be made to the Manager of the staff or if unavailable, the covering Manager, except if the complaint or report is about or from the:
  - a. Manager, the complaint or report should be made to the Director of People and Culture;
  - b. Executive Leadership Team member, other than the Executive Director, the complaint or report should be made to the Executive Director
  - c. Executive Director, the complaint or report should be made to the Board Chair
  - d. Board member, the complaint or report should go to the Board Chair, unless the complaint is about the Board Chair, then it should go to the Board Vice-Chair.
30. All complaints will include (MOL, 2016, p. 49):
  - a. name(s) of the staff who has/have allegedly experienced workplace violence, discrimination or harassment,
  - b. name(s) of the person(s) alleged to have committed it
  - c. name(s) of the witness(es) (if any) or other person(s) with relevant information to provide about the incident (if any) and contact information if not a staff.
  - d. Details of what happened including date(s), time(s), frequency, and location(s) of the alleged incidents(s)
  - e. Any supporting documents the staff making the complaint may have in his/her possession that is relevant to the complaint.
  - f. List any documents a witness or any other persons may have in their possession that is relevant to the complaint.
31. All acts of violence, including sexual assault, threats of violence, and behaviours such as stalking, that are subject to Canada's Criminal Code, should be reported immediately to Police by the complainant if there is an immediate safety concern, or if this did not occur, will be reported to police by the person who received the complaint (MOL, 2016, p. 5 & 40).
32. All complaints and reports will endeavour to be acknowledged within 24 hours of receipt of the complaint or report. If the complainant is not the person who experienced the alleged workplace violence, discrimination or harassment, and they did not report anonymously, they will receive a simple acknowledgement of receiving the complaint or report. If the complainant is the person who experienced the alleged workplace violence, discrimination or harassment, they will also be notified of the immediate next steps.
33. For instances involving aggression or workplace violence, the Union President, or their designate, will be notified by the Director of People and Culture, or their designate, within a reasonable time period, though not more than three (3) business days of the complaint/incident, and receive a copy of the complaint (if in writing) or be provided a summary (CA, Article 14.05(b)).
34. In addition for workplace violence, in the event a staff is disabled or requires medical attention, within four days, notification will be made to the Joint Health and Safety Committee (MOL, 2016, p. 25).
35. For workplace harassment only, information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law (OHSA, 32.0.6(2)(d)).

**Investigation (required under OHSA, s. 32.0.2(2)(d))**

36. The person previously identified to receive the complaint will be responsible for determining who will complete the investigation <For discrimination investigations, HRC guide suggests it should not be the direct manager of anyone involved in the complaint or someone who is normally involved in discipline or influence over the career progress of either of the parties, page 19>. They may choose to complete the investigation themselves or if appropriate, delegate to or complete in collaboration with another Director(s) or Manager(s). Alternatively, an external investigator will be selected for complaints or reports about significant allegations, where a conflict of interest exists, or at the discretion of the Director of People and Culture.
37. Staff who are alleged to have experienced workplace violence, discrimination or harassment, or the person alleged to have committed it, or are a witness, may choose (and must be offered), if applicable, to have a representative with them during any meetings or interviews.
38. All investigations will be completed in a timely manner, taking into account the level of risk, potential harm, and seriousness of the complaint, but not take longer than 90 days (OHRC, 2013, p. 24).
39. The person conducting the investigation whether internal or external to the workplace will, at minimum, complete the following:
  - a. The investigator(s) must ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation. The investigator(s) should remind the parties of this confidentiality obligation at the beginning of the investigation.
  - b. The investigator(s) must thoroughly interview the staff who allegedly experienced the workplace violence, discrimination, or harassment and the person alleged to have committed it (if the person alleged to have committed it is a staff). If the person alleged to have committed it is not a staff, the investigator(s) should still make reasonable efforts to interview them.
  - c. The person alleged to have committed the workplace violence, discrimination or harassment must be given the opportunity to respond to the specific allegations raised by the staff who made the allegations. In some circumstances, the staff who allegedly experienced it should be given a reasonable opportunity to reply.
  - d. The investigator(s) must interview any relevant witnesses employed by the employer who may be identified by either the staff who allegedly experienced the workplace violence, discrimination or harassment, the person alleged to have committed it, or as necessary to conduct a thorough investigation. The investigator(s) must make reasonable efforts to interview any relevant witnesses who are not employed by HPCAS if there are any identified.
  - e. The investigator(s) must collect and review any relevant documents or other evidence that pertains to the investigation.
  - f. The investigator(s) must take appropriate notes and statements during interviews.
  - g. The investigator(s) must prepare a written report summarizing the steps taken during the investigation, the complaint, the allegations of the staff who allegedly experienced the workplace violence, discrimination and/or harassment, the response from the person alleged to have committed it, the evidence of any witnesses, and the evidence gathered. The report must set out findings of fact and come to a conclusion about whether workplace violence, discrimination or harassment was found, not found, or was not possible to make a determination.
40. While the investigation is on-going, the staff who has allegedly experienced workplace violence, discrimination or harassment, the person alleged to have committed it, and any witnesses shall not to discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. The investigator(s) may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.
41. The Director of People and Culture, or their designate, after considering the seriousness of the allegations, the risk of retaliation, potential impact on the investigation, employee well-being and operational feasibility, may use their discretion to determine if separation of any of the involved staff during the investigation is warranted. If separation is determined to be warranted, the reasons for separation will be documented. Separation may occur by:
  - a. temporarily changing work location(s),
  - b. temporarily changing work assignments, or
  - c. placing the person alleged to have committed the workplace violence, discrimination or harassment on administrative leave
42. All staff, who through a fair investigation, have been found to have committed workplace violence, discrimination or harassment, will be subject to the HPCAS' Conduct Progressive Discipline standard and procedure.
43. HPCAS shall consider the applicability of the following corrective actions if there is a finding of workplace violence, discrimination or harassment:
  - a. conduct progressive discipline, up to and including termination
  - b. training and education
  - c. policy, standard and procedures review and updates
  - d. barriers review and updates
  - e. mediation and conflict resolution
  - f. behaviour improvement plan
  - g. written apology
  - h. reassignment or relocation
  - i. support for staff
  - j. monitoring and follow-up
  - k. development and implementation of a safety plan
44. If there is a finding, the staff who experienced the workplace violence, discrimination and harassment, as well as the person who committed it, may be offered to participate in a mediation process, to help inform any correction actions and to help facilitate repair of the relationship.
45. When a risk of further workplace violence, discrimination or harassment has been identified through a finding of such following an investigation, the staff, Manager/Director, and if requested, the Director of People and Culture and/or a representative of the Union, will be jointly responsible for the development of a safety plan that considers the following (OHSA, s. 32.0.4):
  - a. the potential risk factors and anticipated behaviour,
  - b. the potential locations within the workplace where the behaviour is likely to occur,
  - c. if consultation should occur with police, the courts or other organizations who may already be involved to help inform the plan,
  - d. what information other staff may need to reasonably know to help support a plan,
  - e. what information (and not more than is reasonable necessary) other staff have a right to know as it relates to a risk of workplace violence, that is likely to expose them to physical injury and for which they would likely encounter the violent person in the course of their work (OHSA, s. 32.0.5(3-4)),
  - f. who is responsible for what, and
  - g. actions should a risk of workplace violent be imminent, or workplace violence, discrimination or harassment should occur.
46. Those involved in the development of the plan will also make a decision about where the plan will be documented and who will receive a copy or get access to it.
47. The Manager/Director, or otherwise the Director of People and Culture or their designate, will then immediately communicate only what is minimally necessary, to those identified in the plan as requiring this information, to help implement it or to help protect against their own personal safety.
48. Within 10 days of the investigation being completed, the worker who allegedly experienced the workplace violence, discrimination or harassment and the person alleged to have committed it, if they are a staff of the employer, will be informed in person or in writing by the Director of People and Culture of the results of the investigation and any corrective action taken or that will be taken by the employer to address the workplace violence, discrimination or harassment. If there is a finding, the staff who experienced the workplace violence, discrimination or harassment should be informed that the HPCAS' Conduct Progressive Discipline standard and procedure was considered, but otherwise any disciplinary action is kept confidential.
49. For workplace violence only, all incidents involving aggression or violence shall be brought to the attention of the Joint Health and Safety Committee and the Union President (CA, Article 14.05(b)).

## Record Keeping

50. The Director of People and Culture will be provided with and retain records of the investigation, including:
  - a. a copy of the complaint or details about the incident;
  - b. a record of the investigation including notes;
  - c. a copy of the investigation report (if any);
  - d. a summary of the results of the investigation that was provided to the staff who allegedly experienced the workplace violence, discrimination and/or harassment and the person alleged to have committed it, if a staff of HPCAS; and
  - e. a copy of any corrective action taken to address the complaint or incident of workplace violence, discrimination and/or harassment.
51. All records of the investigation will be kept confidential, unless necessary to investigate an incident or complaint of workplace violence, discrimination and/or harassment, take corrective action or otherwise as required by law.

## Disagreement with Employer

52. If a staff believes that a matter involving either their or someone else's experience of harassment or violence on the job has not been corrected by HPCAS or handled correctly, they may consult with the Executive Director and then the Joint Health and Safety Committee who can advocate on their behalf. After this and if still of the same view, or if a staff feels they are unable to raise their concerns with their Manager or HPCAS, they may file a complaint with the Ministry of Labour, Training and Skills Development's Health and Safety Contact Centre.
53. If a staff believes that a matter involving protected grounds was not properly addressed by HPCAS, they may contact the Human Rights Legal Support Centre for help, or the Human Rights Tribunal of Ontario, to file an application. This application must be made within one year after the incident to which the application relates, or if there was a series of incidents within one year after the last incident in the series (HRC, s. 34(1)).
54. If a staff believes they have been terminated or disciplined for exercising their rights under the Ontario Health and Safety Act, they can also file a reprisal complaint with the Ontario Labour Relations Board.

## Forms:

Workplace Violence, Discrimination and Harassment Complaint/Report Form

## Approval History:

New September 1, 2022

Revised October 29, 2024

## Source References:

1. [Occupational Health and Safety Act, R.S.O. 1990, c. O.1](#) – finished reviewing s. 32.0.1-8
2. [Human Rights Code, R.S.O. 1990, c. H.19](#)
3. Collective Agreement
4. Ministry of Labour (MOL). (September 2016). *Health and Safety Guidelines – Workplace Violence and Harassment: Understanding the Law*.
5. Ontario Human Rights Commission (OHRC). (December 2023). *A policy primer: Guide to developing human rights policies and procedures*.



## Workplace Violence, Discrimination and Harassment Complaint Intake/Report Form

Date:
Your name:
Preferred email address for communication about this matter:
Preferred phone number for communication about this matter:
Are you a Huron-Perth Children's Aid Society employee? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, indicate: Your job title:
Reason for contacting the Director of People and Culture: <input type="checkbox"/> I am notifying about something that happened or is happening to me, or that is impacting me in a negative way. <input type="checkbox"/> I am notifying about a concern I have about something that happened or is happening to someone else, or that is impacting someone else in a negative way.
If your concern is about someone else, please provide the name(s) and job title(s) of person(s) impacted:
Name of the person(s) you have witnessed harmful behaviour from:

If applicable, indicate the protected ground(s) under Ontario's Human Rights Code that are connected to your notification (check all that apply):

<input type="checkbox"/> Age	<input type="checkbox"/> Ancestry	<input type="checkbox"/> Colour	<input type="checkbox"/> Race
<input type="checkbox"/> Citizenship	<input type="checkbox"/> Ethnic origin	<input type="checkbox"/> Place of origin	<input type="checkbox"/> Creed
<input type="checkbox"/> Disability	<input type="checkbox"/> Family status	<input type="checkbox"/> Marital status	<input type="checkbox"/> Gender identity
<input type="checkbox"/> Gender Expression	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Record of offences (in employment)

**Describe the harm you, or someone else, experienced in a few words (1-3 sentences). Give a short answer. Your short answer will help us understand the details you give below. Examples: My co-worker said things that made work very uncomfortable for me. My manager humiliates me. Members of my team exclude me because of my race.**

**Workplace Violence, Discrimination and Harassment  
Complaint Intake/Report Form...continued**



**Details of situation:** Describe what the respondent did that harmed you, or someone else. The respondent is the person you say discriminated against or harassed you, or someone else. Conduct can be what someone did or didn't do. Be specific. If you don't know the exact date, give an approximate date (e.g. 29/01/2025 or 30/01/2025). Example, if someone harassed you, write out the words they used. If possible, include witness(es). A witness is someone who saw or heard the incident themselves or someone you spoke to immediately after the incident. Feel free to add or delete rows as necessary.

Dates (DD/MM/YYYY)	Conduct	Witness(es)

**What documents or evidence is available that relates to this situation (e.g. emails, handwritten notes, photographs)?** If possible, attach available documentation or evidence to this form.

**What steps, if any, have you taken so far to raise or resolve your concerns? Include the names and job titles of anyone you have raised your concerns to.**

**What resolution or outcome are you seeking, or would you like to be achieved?**

**Do you have any concerns for your safety?**    Yes    No  
If yes, provide details and contact the Director of People and Culture by phone at 519-801-5891

**Any other relevant information:**

**SAFE CHILDREN. CONFIDENT YOUTH. RESILIENT ADULTS.**  
*To advocate for and protect children's rights; to support and strengthen families;  
and to be leaders for positive change in our community.*

**HEAD OFFICE**  
639 Lorne Avenue East  
Stratford, ON N5A 6S4  
519.271.5290 | 519.272.0953 fax

**BRANCH OFFICE**  
413 MacEwan Street  
Goderich, ON N7A 4M1  
519.524.7356 | 519.524.1541 fax





By implementing these recommendations, HPCAS aims to create a more inclusive and equitable environment for all employees and clients, ultimately improving the workplace culture and service delivery.

**SAFE CHILDREN. CONFIDENT YOUTH. RESILIENT ADULTS.**

*To advocate for and protect children's rights; to support and strengthen families; and to be leaders for positive change in our community.*



**Huron-Perth**  
Children's Aid Society

**HEAD OFFICE**

639 Lorne Avenue East  
Stratford, ON N5A 6S4  
519.271.5290 | 519.272.0953 fax

**BRANCH OFFICE**

413 MacEwan Street  
Goderich, ON N7A 4M1  
519.524.7356 | 519.524.1541 fax