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THE ULTIMATE HOCKEY AND SUMMER CAMP EXPERIENCE.

Title: Anti-Discrimination/Harassment Policy

Revised: February 4, 2020.

Reviewed: September 14, 2021.

Signed & Approved by:

Kevin McLaughlin, Owner & Director

This policy can be made available in an accessible format upon request.

Objective

Hockey Opportunity Camp (HOC) is committed to ensuring that all employees, guests, and associated members are aware that harassment and discrimination are unacceptable practices and are incompatible with the standards of this business, as well as being a violation of the law.

This policy will outline the types of behaviour that may be considered offensive and are prohibited at Hockey Opportunity Camp.

Applicability

This policy is applicable to all employees and guests of Hockey Opportunity Camp.

Policies

Statement of Commitment

Hockey Opportunity Camp is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully and have equal opportunities.

Under the *Ontario Human Rights Code*, every person has the right to be free from harassment and discrimination. Harassment and discrimination will not be tolerated, condoned or ignored at Hockey Opportunity Camp. If a claim of harassment or discrimination is proven, disciplinary measures will be applied, up to and including termination of employment (employees) or removal from camp programming (guests).

Hockey Opportunity Camp is committed to a comprehensive strategy to address





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harassment and discrimination, including:

- Providing training and education to make sure everyone knows their rights and responsibilities.
- Regularly monitoring organizational systems for barriers relating to *Code* grounds.
- Providing an effective and fair complaints procedure.
- Promoting appropriate standards of conduct at all times.

Policy Application

- 1) The right to freedom from discrimination and harassment extends to all employees, including full-time, part-time, temporary, probationary, casual and contract staff, as well as volunteers, co-op students, interns and apprentices.
- 2) It is also unacceptable for members of Hockey Opportunity Camp to engage in harassment or discrimination when dealing with guests, or with others we have professional dealings with, such as suppliers or service providers.
- 3) This policy applies at every level of the organization and to every aspect of the workplace environment and employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits and termination. It also covers rates of pay, overtime, hours of work, holidays, shift work, discipline and performance evaluations.
- 4) This policy also applies to events that occur outside of Hockey Opportunity Camp's physical workplace such as during business trips, hiring weekends, Staff Development Programs, conferences, and all other related business activities.

Protected Grounds

This policy prohibits discrimination or harassment based on the following grounds, and any combination of these grounds:

- Age
- Creed (religion)
- Sex (including pregnancy and breastfeeding)
- Sexual orientation





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- Gender identity
- Gender expression
- Family status (such as being in a parent-child relationship)
- Marital status (including married, single, widowed, divorced, separated or living in a conjugal relationship outside of marriage, whether in a same-sex or opposite-sex relationship)
- Disability (including mental, physical, developmental or learning disabilities)
- Race
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Colour
- Record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received)
- Association or relationship with a person identified by one of the above grounds
- Perception that one of the above grounds applies.

Key Concepts

It is important to note that people experiencing harassment may not outwardly object to the harassing comments or conduct. People may feel unable to object. For example, they may be in a vulnerable situation and be afraid of the consequences of speaking out. It doesn't matter if someone voices objections or not to the person making the unwelcome comments – they can still make a complaint and the behaviour can still be found to be harassment.

The following behaviour is prohibited at Hockey Opportunity Camp:

- 1) **Discrimination:** means any form of unequal treatment based on a *Code* ground, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral, but disadvantage certain groups of people. Discrimination may take obvious forms, or it may happen in very subtle ways. Even if there are many factors affecting a decision or action, if discrimination is one factor, that is a violation of this policy.





Discrimination includes any disrespectful jokes, innuendos, slurs, and comments.

- 2) **Harassment:** means a course of comments or actions that are known, or ought reasonably to be known, to be unwelcome. It can involve words or actions that are known or should be known to be offensive, embarrassing, humiliating, demeaning or unwelcome, based on a ground of discrimination identified by this policy. Harassment can occur based on any of the grounds of discrimination.

Examples of harassment include:

- Epithets, remarks, jokes or innuendos related to a person's race, gender identity, gender expression, sex, disability, sexual orientation, creed, age, or any other ground.
- Posting or circulating offensive pictures, graffiti or materials, whether in print form or via email or other electronic means.
- Singling out a person for humiliating or degrading "teasing" or jokes because they are a member of a *Code*-protected group.
- Comments ridiculing a person because of characteristics that are related to a ground of discrimination. For example, this could include comments about a person's dress, speech or other practices that may be related to their sex, race, gender identity or creed.

If a person does not explicitly object to harassing behaviour, or appears to be going along with it, this does not mean that the behaviour is okay. The behaviour could still be considered harassment under the *Code*.

- 3) **Sexual and gender-based harassment:** sexual harassment is a form of harassment that can include:
- a) Gender-related comments about a person's physical characteristics or mannerisms.
 - b) Paternalism based on gender which a person feels undermines his or her self respect or position of responsibility.
 - c) Unwelcome physical contact and/or sexual attention.
 - d) Suggestive or offensive remarks or innuendos about members of a specific gender.
 - e) Propositions of physical intimacy.





- f) Gender-related verbal abuse, threats or taunting.
 - g) Leering or inappropriate staring.
 - h) Bragging about sexual prowess or questions or discussions about sexual activities.
 - i) Offensive jokes or comments of a sexual nature about an employee or guest.
 - j) Rough and vulgar humour or language related to gender.
 - k) Display of sexually offensive pictures, graffiti or other materials including through electronic means.
 - l) Demands for dates or sexual favours.
 - m) Implied or expressed promise of reward for complying with a sexually-oriented request.
 - n) Implied or expressed threat of reprisal or actual reprisal for refusal to comply with a sexually-oriented request.
 - o) A sexual relationship which constitutes an abuse of power in a relationship of trust.
 - p) Sexually oriented remarks or behaviour which may reasonably be perceived to create a negative psychological and emotional environment.
- 4) **Sexual Solicitation:** this policy prohibits sexual solicitations or advances by any person who is in a position to grant or deny a benefit to the recipient of the solicitation or advance. This includes managers and supervisors, as well as co-workers where one person is in a position to grant or deny a benefit to the other. Reprisals for rejecting such advances or solicitations are also not allowed.
- 5) **Poisoned environment:** a poisoned environment is created by comments or conduct (including comments or conduct that are condoned or allowed to continue when brought to the attention of management) that create a discriminatory work environment. The comments or conduct need not be directed at a specific person, and may be from any person, regardless of position or status. A single comment or action, if sufficiently serious, may create a poisoned environment.
- 6) **Initiation/Hazing:** initiation or “hazing” or any employee or guest will not be tolerated at Hockey Opportunity Camp. Hazing refers to any activity expected of someone joining a group (or to maintain full status in a group) that humiliates, degrades, forces consumption or risks emotional and/or physical harm,





regardless of the person's willingness to participate. This and other inappropriate behaviour could result in employee termination or guest removal.

- 7) **Hate Group Activities:** Hate group activities represent some of the most destructive forms of human rights-based discrimination by promoting hatred against identifiable groups of people. Hate groups generally label and disparage people who may include immigrants, people with disabilities, members of particular racial, religious or cultural groups, people who are gay or lesbian. Hate group activities will not be tolerated at Hockey Opportunity Camp. Such activities contravene this policy, and other potential camp policies related to employee and guest safety and may also contravene the Criminal Code of Canada.

- 8) **Negative Discipline of Campers:** Under no circumstance should any camper be deprived of food, sleep or other basic necessities while under the care of Hockey Opportunity Camp. In the management of negative camper behaviour, campers will not be subject to ridicule, threat, corporal punishment, excessive exercise, physical/verbal force/intimidation, rough play, or other forceful actions, as well as swearing, sarcasm, or yelling. If any staff has difficulty with a camper's behaviour, the staff should speak with his/her Section Head, Supervising Director or the Camp Director for help in providing for the safety / well-being of the campers.

Roles & Responsibilities

- 1) All persons present in Hockey Opportunity Camp are expected to uphold and abide by this policy, by refraining from any form of harassment or discrimination, and by cooperating fully in any investigation of a harassment or discrimination complaint.

- 2) Sexual and/or romantic involvement (including sexual intercourse, fondling, sexual contact or inappropriate physical contact) between staff members and campers (including LIT/CITs), is unacceptable and grounds for dismissal and possible criminal charges.

- 3) Directors and Sr. Staff have the additional responsibility to act immediately on observations or allegations of harassment or discrimination. Directors and Sr.





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Staff are responsible for creating and maintaining a harassment- and discrimination-free environment, and should address potential problems before they become serious.

- 4) Directors, Sr. Staff and all other employees are expected to adhere to this policy, and will be held responsible by the employer for not following it. Employees are not to be penalized or disciplined for reporting an incident or for participating in an investigation involving workplace harassment.

Complaints

All those who are covered by this policy are entitled and encouraged to complain about discrimination and harassment and are entitled to have access to the complaint procedures. In addition, nothing in these procedures precludes individuals who believe they are targets of (or have witnessed) discrimination and harassment from directly expressing that the behaviour is inappropriate and must stop immediately. Many complaints can be resolved quickly and effectively using this approach. In order to stop discrimination and harassment, Supervisory and Directing Staff must expeditiously address and attempt to resolve complaints under this policy and procedures. See Hockey Opportunity Camp Complaints Policy for further details on the process.

If an employee needs further assistance, he or she may contact the **Joint Health Safety Committee or Health and Safety Representative (Administrative Director)**, or the **Ontario Human Rights Legal Support Centre**.

Violation of this policy will be subject to disciplinary action up to and including dismissal, and possibly criminal investigation.

