

POLICY TO PREVENT AND COUNTER PSYCHOLOGICAL HARASSMENT AND SEXUAL VIOLENCE IN THE WORKPLACE



1. Objectives

- 1.1. To affirm the commitment of the Québec Golf Federation («Golf Québec») to prevent and put a stop to any situation of psychological harassment or violence of a sexual nature in the workplace, including harassment or violence originating from external sources.
- 1.2. Indicate the means put in place to prevent psychological harassment or sexual violence, including the information and training programs offered.
- 1.3. Establish the procedure for handling complaints and reports when problematic situations are brought to the attention of Golf Québec.

2. Definitions

- 2.1. “Human Resources” refers to any person who works for Golf Québec, including staff members and volunteers.
 - 2.1.1. “Staff member” means any person in an employment relationship (full-time, part-time or occasional) with Golf Québec, as well as any contractor working on behalf of Golf Québec.
 - 2.1.2. “Volunteers” means any person who works on a volunteer basis for Golf Québec, including members of the Board of Directors.
- 2.2. “Concerned Parties” means all persons affected by a complaint or report, i.e.:
 - 2.2.1. The person or persons who filed the complaint or report.
 - 2.2.2. The person or persons who are the subject of the complaint or report.
 - 2.2.3. The person or persons who witnessed the situation reported.
- 2.3. “Psychological harassment” means unwanted, express or implied, inappropriate, hurtful or insulting behaviour by an individual towards one or more other individuals, where the perpetrator knew or reasonably ought to have known that such behaviour could cause offence or harm. It also includes any act, comment or gesture which demeans, belittles, humiliates or embarrasses a person and which results in a harmful effect and a harmful environment for that person.

- 2.3.1. This definition includes discrimination based on any of the grounds listed in section 10 of the *Charter of Human Rights and Freedoms* (race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, handicap or the use of any means to palliate a handicap).
- 2.3.2. Examples of behaviour that may be linked to psychological harassment include:
- Intimidation, cyberbullying.
 - Threats, isolation.
 - Offensive or defamatory comments or gestures about a person or their work.
 - Verbal abuse.
 - Denigration.
- 2.4. “Sexual violence” refers to behaviour characterized by unsolicited words, acts or gestures of a sexual nature, which, by their very nature, could undermine the dignity or physical or psychological integrity of the person to whom they are directed and create a harmful environment for that person. Sexual violence may be directed against women or men or between people of the same sex. It can be physical, verbal or psychological.
- 2.4.1. For example, behaviours that can be linked to sexual violence include any form of unwanted attention or advances with a sexual connotation, such as:
- Insistent solicitation.
 - Stares and physical contact.
 - Sexist insults and foul language.
 - Sexual comments, jokes or images.
- 2.5. “Workplace” means:
- 2.5.1. “Golf Québec Premises”, including offices, cafeterias, meeting rooms, washrooms, parking lots, warehouses, common areas, and other places located at the Maison du Loisir et du Sport where Staff Members perform their duties for Golf Québec.
- 2.5.2. “Remote Work Locations” which, in accordance with the Remote Work Policy, are defined as locations where Staff Members are authorized to perform functions normally performed on the employer's premises.
- 2.5.3. “Event sites” include locations where competitions and activities scheduled by Golf Québec take place, as well as training locations where Staff Members are likely to be in the course of their employment (e.g. golf

clubs, driving ranges, outdoor or indoor training centres, parks, gymnasiums, etc.).

2.5.4. “Social Activity Sites” include places where informal meetings of Staff Members or activities aimed at recognizing Volunteers are organized, social networks, and other places where Golf Québec Human Resources perform their duties, whether in person or virtually.

3. Scope

- 3.1. This Policy applies to all Human Resources at Golf Québec, at all hierarchical levels.
- 3.2. This Policy applies to all situations that arise in the context of work, whether they occur in the workplace or outside of it, and whether they occur during normal working hours or outside of them.
- 3.3. This Policy also applies to communications transmitted or received by any means, technological or otherwise, in a work context (e.g. social media, e-mails, text messages, posters, letters, etc.).

4. Administration Rule

- 4.1. Psychological harassment and sexual violence in the workplace are prohibited in all their forms and Golf Québec does not tolerate them at any time.
- 4.2. The Policy does not restrict the authority of directors and supervisors in areas such as performance evaluation, follow-up meetings, labour relations management, the application of administrative or disciplinary measures or the allocation of tasks.

5. Responsibility of Human Resources

- 5.1. All Human Resources are responsible for adopting behaviour that promotes a workplace free from psychological harassment or violence of a sexual nature. To this end, the expectations of all Human Resources are as follows:
 - 5.1.1. Contribute to maintaining a workplace free from psychological harassment and sexual violence.
 - 5.1.2. Respect individuals in the context of their work.
 - 5.1.3. Participate in the mechanisms put in place by Golf Québec to prevent and put a stop to psychological harassment and sexual violence.
 - 5.1.4. Report as soon as possible any situation related to psychological harassment or violence of a sexual nature to one of the persons designated by Golf Québec to receive and handle complaints and reports.

- 5.2. Golf Québec expects everyone to cooperate and encourages all Concerned Parties to make known their disapproval of any behaviour deemed problematic and contrary to this Policy and to avail themselves of this Policy if necessary.

6. Prevention of Psychological Harassment and Sexual Violence

- 6.1. Golf Québec is committed to taking reasonable measures to provide a work environment free of any form of psychological harassment or sexual violence to protect the dignity, psychological integrity, and physical integrity of individuals.
- 6.2. In compliance with its legal obligations, Golf Québec implements measures aimed at identifying, controlling, and eliminating the risks of psychological harassment and violence of a sexual nature, notably by:
 - 6.2.1. Disseminating this Policy in such a way as to make it accessible to all its Human Resources, by posting it on its website, and incorporating it into its Code of Ethics for Human Resources, which is signed annually.
 - 6.2.2. Continuously monitoring risks and risk factors likely to generate situations of psychological harassment or sexual violence.
 - 6.2.3. Ensuring that the Policy is understood and complied with.
 - 6.2.4. Promoting respect between individuals.
 - 6.2.5. Regularly raising awareness among all Human Resources of their roles and responsibilities in preventing psychological harassment and sexual violence.
 - 6.2.6. Implementing a training and awareness program for all Human Resources, including onboarding training for new employees and the annual signing of a Code of Ethics in which all Human Resources renew their commitment to knowing and respecting Golf Québec's policies.
 - 6.2.7. Consulting Human Resources on situations specific to their workplace that could create conditions that could lead to psychological harassment or sexual violence.
 - 6.2.8. Holding meetings with people who leave their jobs or stop volunteering to find out the reasons for their departure.
 - 6.2.9. Establishing a diligent process for handling complaints and reports.

7. Filing a Complaint or a Report

- 7.1. Any member of Golf Québec Human Resources who believes that he or she is experiencing psychological harassment or sexual violence in the workplace may file a complaint so that Golf Québec can take the necessary action to correct the situation.

- 7.2. Any member of Golf Québec Human Resources who witnesses behaviour or conduct that resembles psychological harassment or violence of a sexual nature, or is at risk of becoming such, may also file a report to bring the situation to the attention of Golf Québec.
- 7.3. A complaint or a report must be filed as soon as possible, but no later than two (2) years after the last event or events giving rise to it.
- 7.4. A complaint or a report may be made verbally or in writing. The description of the facts complained of must be as detailed as possible and the person or persons identified as responsible for the said facts must be named to facilitate prompt and diligent handling.
- 7.4.1. Verbally, a complaint or a report may be submitted to Golf Québec's Executive Director.
- Depending on the context, a complaint or a report may also be made verbally to one of the Staff Members responsible for managing a program or an event, and this Staff Member should report it to the Executive Director in his or her activity reports.
- 7.4.2. In writing, a complaint or a report should be made by sending an e-mail to: plaintes@golfquebec.org.

8. Person Responsible for Handling Complaints and Reports

- 8.1. When a complaint or a report is lodged, the person responsible for dealing with it under this Policy must be independent.
- 8.1.1. In most cases, this person will be the Executive Director of Golf Québec or a person designated by the Executive Director.
- 8.1.2. Exceptionally, the Board of Directors will be responsible for handling complaints against the Executive Director.
- 8.2. The Executive Director shall ensure that all persons included in the Human Resources of Golf Québec are aware of this Policy and the complaint handling process.
- 8.2.1. He or she must provide advice on any questions concerning the prevention of psychological harassment and sexual violence in the workplace.
- 8.2.2. He or she must regularly remind Staff Members of the existence of the Policy and provide appropriate follow-up.
- 8.2.3. He or she must organize training and information sessions on the Policy.

9. Handling of Complaints and Reports

- 9.1. Golf Québec undertakes to:
 - 9.1.1. Protect the confidentiality of the intervention process, including information relating to the complaint or report.
 - 9.1.2. Preserve the dignity and privacy of the Concerned Parties.
 - 9.1.3. Ensure that all Concerned Parties are treated humanely, kindly, fairly and objectively and that they are offered appropriate support.
- 9.2. Complaints and reports are dealt with as quickly as possible, so that prompt action can be taken to put an end to the situation reported.
- 9.3. The person in charge verifies that the complaint or report is well founded by means of an appropriate investigation. If necessary, he or she may call on an external resource person to analyze the nature, relevance, and merits of a complaint.
 - 9.3.1. He or she meets with the Concerned Parties, if necessary, to assess the seriousness and extent of the acts complained of.
 - 9.3.2. He or she informs the person who is the subject of a complaint of the progress of the complaint against him or her.
 - 9.3.3. He or she ensures that the presumption of good faith of the person who is the subject of a complaint is respected, as well as his/her right to be heard at any stage of this Policy.
 - 9.3.4. He or she shall put in place any temporary preventive measures that may be necessary to protect the victim from further psychological harassment, sexual violence or reprisals in the workplace during and after the investigation.
- 9.4. If the allegations prove to be true, the person in charge shall take all reasonable measures to resolve the situation, including implementing corrective measures if necessary.
 - 9.4.1. With the agreement of the Concerned Parties, and where appropriate, the person in charge will verify whether a mediation meeting would allow the situation to be remedied; if necessary, the person in charge may call on the services of a neutral and impartial external resource person.
 - 9.4.2. If this is not possible, or if the inappropriate conduct continues despite an initial approach, he or she will take the necessary steps to find a solution to the situation, which may include sanctions depending on the seriousness, extent, and frequency of the acts committed.
 - 9.4.3. In all circumstances, he or she ensures that the means are in place to re-establish a healthy working environment and avoid reprisals.

- 9.5. If the investigation does not establish that unacceptable behaviour has taken place, all material evidence will be kept for two (2) years and destroyed thereafter.
- 9.6. If a complaint is found to be abusive, frivolous or made in bad faith, the complainant may be subject to disciplinary or administrative measures.

10. Corrective Measures

- 10.1. The person responsible for handling a complaint or a report will decide whether one or more corrective measures are required. The choice of the applicable measure(s) will consider the seriousness and consequences of the action(s) taken, as well as the previous record of the person who took the action(s).
- 10.2. For Staff Members, the following measures may be taken, but are not limited to:
 - 10.2.1. Interim measures before and during the investigation (e.g. suspension, leave of absence with or without pay, or transfer).
 - 10.2.2. Request for a formal apology.
 - 10.2.3. Verbal or written reprimand.
 - 10.2.4. Participation in a training session on appropriate behaviour in the workplace.
 - 10.2.5. External consultation.
 - 10.2.6. Suspension without pay for a specified period.
 - 10.2.7. Transfer.
 - 10.2.8. Demotion.
 - 10.2.9. Termination.
- 10.3. In the case of Volunteers, the following measures may be taken, without limitation:
 - 10.3.1. Interim measures before and during the investigation (for example, a ban on participating in activities or a change of assignment).
 - 10.3.2. Request for a formal apology.
 - 10.3.3. Verbal or written reprimand.
 - 10.3.4. Participation in a training session on appropriate behaviour in the workplace.
 - 10.3.5. External consultation.
 - 10.3.6. Temporary or permanent ban from participating in activities or accessing Golf Québec programs and services.