



Institutional Policy to counter sexual violence

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Version 1.2

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1. OBJECTIVES

The objectives of the institutional policy on sexual violence are :

- a) To prevent sexual violence against members of the college' community ;
- b) To put in place a system to process disclosures, reports or complaints.
- c) To provide assistance and support measures adapted to the needs of sexual violence victims.

2. FIELD OF APPLICATION

The policy applies to the college-level institution « Collège Greystone ».

The policy does not apply to practicum places as these places fall under the policy of the company hosting the intern.

3. DEFINITION OF SEXUAL VIOLENCE

The college defines sexual violence as

any form of violence committed through sexual practices or by targeting sexuality. It also refers to any other misconduct, including that relating to sexual and gender diversity, in such forms as unwanted direct or indirect gestures, comments, behaviours or attitudes with sexual connotations, including by a technological means, such as cyberexploitation, cyberharassment and cyberaggression.

It especially includes sexual misconduct, sexual harassment and sexual assault.

One can read the definitions on sexual misconduct, sexual harassment and sexual assault in addendum 1.

4. ROLES AND RESPONSIBILITIES

4.1 All college employees (teachers included)

- Read the policy.
- Abide by the policy.

4.2 College Director

- Apply this policy
- Put training and prevention activities in place
- Update the policy
- Form the committee on sexual violence :
 - o Nominate committee members
 - o Fill a position left vacant following the departure of one of its members.
- Provide information et resources to the committee, should need be
- Act as one of the three respondents for the college' centralized gateway.
- Act within the boundaries set
 - o By this policy
 - o By the applicable legal framework

4.3 Project Manager

- Act as one of the three respondents for the college' centralized gateway.
- Provide information et resources to the college director and the committee, should need be
- Act within the boundaries set
 - o By this policy
 - o By the applicable legal framework

4.4 Salaried Employee member of the Centralized Gateway

- Act as one of the three respondents for the college' centralized gateway.
- Act within the boundaries set
 - o By this policy
 - o By the applicable legal framework

4.5 Committee on Sexual Violence

The committee is composed of students, teachers and non-teaching staff members, nominated by the campus director, on a basis of representativeness. It is in charge of

- Advising the college director and the project manager in relation to the content and the application of the policy.
- Making recommendations to the college director to prevent harassment and sexual violence.
- Proposing prevention and training activities for college staff and students in relation to sexual harassment and violence to the college director. These activities may be mandatory.
- Organizing, possibly and with the approval of the college director, training and prevention activities.

4.6 Board of Directors

The Board of Directors of the corporation operating Collège Greystone can :

- Make recommendations to the college director to prevent harassment and sexual violence.
- Propose prevention and training activities in relation to sexual harassment and violence to the college director. These activities could be either for college staff or for students.

5. PREVENTIVE MEASURES

Every year, the college director puts in place various measures aiming at preventing and at fighting against sexual violence. The college director organizes at least two mandatory training session for all college staff, including the project manager and himself, on questions related to sexual violence. The college informs students about the existence of the policy against sexual violence on orientation day, tells them how they can consult it, gives them recommendations and reminds them that they can reach a psychologist or a social worker at any time through the mobile application they have access to, to that end.

As for selecting preventive measures, the college takes into account the people that are most subject to suffer from sexual violence, such as the following minorities : sexual, gender, cultural communities and aboriginals. The college also takes international students and disabled students into account.

6. SAFETY

Classes on college happen at the same times as courses of other programs, to ensure the students' safety.

The college moved at the beginning of 2020. It has adapted its premises to ensure the safety of its students in terms of sexual violence: all offices and classrooms are fully windowed, so that everyone can see what is happening inside. All lunch areas are open; they open onto corridors to which they are directly connected. The main corridor for circulating around the campus is very wide (easily 7 meters wide) ; it can accommodate a very large number of students, has a rectangular shape (without any corners or shadow corners).

7. CONTROLLING WELCOMING ACTIVITIES

The college doesn't organize welcoming activities other than the information sessions for students, made by employees, in class and in groups.

8. MEASURES APPLICABLE TO INTIMATE RELATIONSHIPS IN THE CONTEXT OF PEDAGOGICAL, SUPPORT OR AUTHORITY RELATIONSHIPS.

Students attend school voluntarily for a clearly defined purpose. The role of staff and employees is to serve those students by helping them to achieve their personal, academic and professional goals. While it is important that the employees of Collège Greystone establish and maintain high standards, it is equally important that there be a natural spirit of respect, cooperation and flexibility in the implementation of policies which can provide an optimal context for learning and growth. At Collège Greystone , students and faculty work together as partners to accomplish a common objective. The school environment should be characterized by free expression, inquiry, and discussion.

Employees of Collège Greystone and members of the faculty and staff are required to maintain professional relations with students at all times and to avoid personal relationships that may have the effect of compromising the students' educational experience.

Collège Greystone strongly objects to employees becoming personally or socially involved with students in any way other than school sanctioned activities. Student fraternization is not in the best interest of the students or ILSC Education Group. Employees who disregard this policy subject themselves to disciplinary action, up to and including termination.

"Students" are defined as all students currently enrolled at Collège Greystone, including the period during their internships/co-op placements. In addition, "fraternization" includes any social involvement, such as socializing off campus, via social media or any activity outside of school sponsored activities up to and including a dating relationship. Employees are also encouraged to review the Communication Policy and Procedures for social media use.

9. CENTRALIZED GATEWAY

At the adoption of this policy, the college sets in place a centralized gateway for listening, support and complaint reception services for students concerned in relation to sexual violence.

These services are provided by the college director, the project manager and one feminine college salaried employee.

10. PROCESS FOR RECEIVING AND PROCESSING A DISCLOSURE, REPORT OR COMPLAINT

Any person aiming at submitting a disclosure, report or complaint related to this policy concerning one member of the college' community can do so using the Centralized gateway.

Following the reception of a disclosure, report or complaint, the centralized gateway ensures to provide the person the listening, the psychosocial support, support measures and reference to specialized services (e.g. legal services) s/he requires.

The centralized gateway pays great attention to the people facing a higher risk of being exposed to sexual violence, such as sexual, gender, cultural and aboriginal minorities, international and disabled students, upon the reception of a person submitting a complaint, a disclosure or report concerning sexual violence.

The people in charge of the Centralized gateway commit to collaborate with external interveners only with the consent of the person having submitted the information.

The college commits to follow up on any request as soon as possible, within seven days.

When a disclosure or report is being submitted to the centralized gateway, the college director or the project manager must :

- Welcome the person, either victim or third party, and listen to her/him.
- List all possible interventions and suggest some. This intervention can take various forms, for instance :
 - Support measures
 - Accomodation measures
 - Refer the person to a professional in this field ;
 - Restorative measures, for instance, mediation between the people concerned;
 - Intervention in the environment;
 - Referencing, supporting and providing information to the person;
 - Submitting a complaint ;
 - Submitting a criminal complaint;
 - Etc.

The measures put in place can be maintained, modified or cancelled during the entire process. If a measure can't proceed (e.g., criminal complaint), the person can still continue to deal with the centralized gateway concerning the disclosure, report or complaint, either for listening or seeking other measures.

The college director is the person in charge of applying the interventions chosen by the person having submitted the complaint, the disclosure or report.

In any case and at all times, the person can put an end of the process.

The centralized gateway will follow up with the people concerned to make sure the situation is resolved.

11. PROCESSING OF AN ADMINISTRATIVE COMPLAINT

The processing of an administrative complaint begins when it is submitted to the Centralized gateway, either as a simple writing, or put into writing by the project manager. Anyone of the two other members of the centralized gateway can ask the project manager for assistance to record a complaint in writing.

The college director, consulting the project manager if needed, examines the complaint in order to evaluate if it is receivable. The criteria for examining the receivability of a complaint are as follows :

- The plaintiff is a member of the community of the college ;
- The person concerned is a member of the college' community ;
- The complaint concerns sexual violence issues and complies with the definitions for sexual violence.

If the complaint is deemed unreceivable, the college director or the project manager informs the plaintiff in writing, explaining the reasons why the complaint is deemed as unreceivable.

If the complaint is deemed receivable, the college director or the project manager investigate to collect information on the complaint. The human resources director of the corporation must be involved in any investigation where an employee is suspected. Afterwards, the college director applies the appropriate sanctions, if the result of the investigation confirms that the policy hasn't been complied with.

Complaints received at the Centralized gateway are processed within a maximum of 90 calendar days.

12. CRIMINAL COMPLAINT

In case of a complaint submitted to the police corps, it will follow the usual track in the criminal justice system.

13. CONFIDENTIALITY

The employee working at centralized gateway and receiving information must keep it confidential, except

- In case the person having provided the information authorizes it in writing ;
- If law requires or authorizes it by an express clause;
- if the person who lodged an administrative complaint asks to know the consequences, including a possible sanction, the details and terms of this, if applicable;
- If the information concerns a minor, in which case the *Direction de la protection de la jeunesse* must be informed ;
- To prevent an act of violence, such as suicide or
- When a person's physical integrity or safety is at stake ;
- When s/he has a reasonable motif to believe an imminent danger of death or serious wounds threatens an identifiable person or group of people ;
- To communicate information to the college director or to his supervisor, the chief operations officer, to make a decision regarding measures or a sanction to be applied in accordance with this policy.

The information can be communicated only to the person or people concerned and those deemed able to provide them assistance. In any case, the employee transmitting information discloses only the information necessary for the communication's aim to be achieved.

14. MEASURES TO PROTECT AGAINST RETALIATION

Any retaliation or threat of retaliation targeting anybody in relation to a complaint, a disclosure or report, whether past, current, or future, is strictly prohibited.

All individuals who participate in the investigation process are entitled to be free from negative reprisal for having participated. Any employee / student who retaliates against another employee / student who has made a report under this policy may be subject to discipline up to and including termination of employment, in the case of an employee, and suspension, in the case of a student. Should any

employee / student experience any negative repercussions for having participated in an investigation, they are asked to bring this information to the Investigator or to the management.

15. APPLICABLE SANCTIONS IN CASE OF NON-COMPLIANCE WITH THE POLICY

Non-compliance with the current policy can trigger administrative or disciplinary measures imposed by the college director, in function of the corporation's specific rules, especially the employee manual, and consulting with the corporation's human resources director, should need be.

In the context of any contractual relationship with a third party, the college could put an end to any contract for reasons of non-compliance.

16. DIFFUSION OF THE *POLICY*

The *Institutional Policy to counter sexual violence* is accessible to all college students in the student portal. It is also accessible on the student mobile application. College employees can consult the policy in the human resources section of the internal company website. The college will send host families an electronic copy of the policy.

17. REVIEW OF THE *POLICY*

The policy has to be revised, should the college director decide so. Still, it must mandatorily be reviewed once every year. In his process to modify the policy, the college director consults the committee on sexual violence. He decides if he accepts the new policy and when it comes into force.

ADDENDUM I – DEFINITIONS

Sexual Assault

Sexual assault is an infraction as per the Canadian Criminal Code. It is an act that is sexual in nature, with or without physical contact, committed by an individual without the consent of the victim, or in some cases, through emotional manipulation or blackmail. It is an act aiming at subjecting another person to the perpetrator's desires through an abuse of power, and/or the use of force or coercion, and/or implicit or explicit threats. Sexual assault violates fundamental rights, particularly with regard to physical and psychological integrity and security of the person.

Sexual harassment

It pertains to any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, written comments, actions or gestures, that affects the dignity or psychological or physical integrity of the person and that results in a harmful work or study environment.

A single serious incidence of such behaviour that has a lasting harmful effect on a person may also constitute psychological harassment.

Sexual Misconduct

Sexual misconduct refers to gestures, behaviour or verbal comments having a sexual connotation taking place in the context of a professional relationship as per the *Professional Code* or between students.