

HARASSMENT, DISCRIMINATION, AND VIOLENCE PREVENTION POLICY

**APPROVED BY PRAIRIE THEATRE EXCHANGE BOARD OF DIRECTORS ON
JUNE 16, 2025**

INTRODUCTION

Everyone involved with Prairie Theatre Exchange ("PTE") is entitled to a positive environment in which everyone is treated with respect and dignity, and that is free of harassment, unlawful discrimination, and workplace violence.

PTE has developed this policy with the intention to ensure so far as reasonably practicable that no one is subjected to harassment, unlawful discrimination or workplace violence, and to deal quickly and effectively with any incident that might occur.

The procedures for reporting harassment, discrimination and violence are set out in this policy.

This policy is not intended to discourage or prevent a complainant from exercising any other legal rights, actions or remedies that may be available pursuant to any other law. Pursuant to legislation, persons have the right to contact the Manitoba Human Rights Commission to file complaints alleging reprisals, discrimination or harassment, or Workplace Safety and Health and file complaints alleging reprisals, harassment or workplace violence.

PTE Leadership will ensure everyone is aware of the risks of harassment, unlawful discrimination, and workplace violence and are properly trained and equipped to protect themselves. As such, PTE is committed to:

- providing a safe, healthy and harassment/discrimination/violence-free environment, to the extent reasonably practicable;
- dedicating sufficient attention, resources and time to address factors that contribute to harassment, unlawful discrimination, or workplace violence including but not limited to bullying, teasing and abusive and other aggressive behavior, and to prevent and protect against it;
- communicating to all concerned information in its possession about factors contributing to harassment, unlawful discrimination, or workplace violence;
- providing training on this policy as reasonably required and at least annually to staff and volunteers;
- ensuring all concerned comply with this policy; and
- assisting those who have been exposed to harassment, unlawful discrimination, or workplace violence.

This policy applies to everyone employed with PTE as well as to third parties (such as contractors, artists, technicians, casual crew, volunteers, patrons, or visitors) on-site at

PTE or off-site in a context connected to PTE's activities. These persons will be apprised of this policy by email at the time of engagement and/or contracting or otherwise at least annually. This policy will be posted throughout the workplace in conspicuous locations and also on PTE's website.

Anyone experiencing or observing harassment, unlawful discrimination, or workplace violence should not assume PTE Leadership is aware a problem exists.

If someone believes they are being harassed, unlawfully discriminated against, or the subject of workplace violence, or has witnessed any of this behaviour, or has reason to believe it is occurring, PTE asks that person to advise PTE Leadership as soon as possible. The procedures for reporting are set out below in this policy.

This policy prohibits reprisals against anyone acting in good faith who reports an incident of harassment, discrimination, or workplace violence, or who acts as a witness.

PTE will take all reasonable measures to prevent reprisals or threats of reprisal.

This policy prohibits anyone from knowingly making a false complaint or providing false information regarding a complaint.

PTE will take decisive and suitable action in response to:

- anyone found to have engaged in conduct constituting harassment, unlawful discrimination, or workplace violence; or
- anyone who takes or threatens a reprisal, or knowingly makes a false complaint or provides false information regarding a complaint.

Such person will (regardless of their position or seniority) face appropriate disciplinary action up to and including dismissal and/or removal, and such other action as reasonably required to ensure a positive environment in which everyone is treated with respect and dignity, and that is free of harassment, unlawful discrimination and workplace violence.

DEFINITIONS

"Competent Person" means a person who:

- is impartial and is reasonably seen by the parties to be impartial;
- has knowledge, training, and experience in issues relating to harassment, unlawful discrimination, and workplace violence; and
- has knowledge of relevant law and legislation.

"Harassment" is a type of discrimination. Harassment creates a hostile or intimidating environment, in which verbal or physical conduct, because of its severity and/or persistence, is likely to interfere significantly with an individual's performance, or creates a risk to a person's health, psychological or physical wellbeing.

- It may be broadly defined as a single severe event (in some circumstances) or a series of incidents that involve unwelcome or objectionable comments, conduct or display undertaken or made on the basis of a Protected Characteristic.
- Harassment also includes any unpleasant and offensive conduct, comment, action, gesture or display that is directed at a person or group of persons that disrespects, humiliates or embarrasses them.
- Harassment may create an uncomfortable, hostile and/or intimidating work environment. It may also involve the improper use of power or authority over another person. Behavior need not be intentional in order to be considered harassment.
- Harassing behavior may threaten the health or safety of a person, threaten their job or income, undermine their ability to perform their job successfully, interfere with their job or career, negatively impact their mental or physical health, and result in a harmful workplace.
- Harassment does not include exercising normal managerial rights and responsibilities such as assigning and organizing work, evaluating performance, setting reasonable standards of work, or taking corrective action (e.g. coaching, counseling or discipline) with respect to conduct or performance.

"Personal Harassment" is a type of harassment and is defined as a course of continuous conduct that is objectionable, unwelcome, degrading and offensive, serves no legitimate work-related purpose, and has the effect of interfering with a person's work performance, psychological or physical well-being, or creates an intimidating, humiliating, hostile or offensive environment. It can include:

- unjustified, unfair criticism or ridicule;
- insults, mocking, belittling or abusive comments and behaviour especially in front of others;
- repeated incidents of yelling, screaming or name calling; and/or
- behaviour that is rude, intimidating or vindictive;

Personal harassment is not necessarily based on grounds protected by human rights legislation. Personal harassment may also involve the cruel, harsh, unfair or threatening treatment of someone which may or may not have as its object encouraging that person to terminate their employment or relationship with PTE.

Like other forms of harassment, personal harassment may involve a single event if sufficiently severe, so as to have a lasting, harmful effect on the person.

"Protected Characteristic" includes

- a person's ancestry, including colour and perceived race;
- nationality or national origin;

- ethnic background or origin;
- religion or creed, or religious belief, religious association or religious activity;
- age;
- sex, including sex-determined characteristics or circumstances such as pregnancy, the possibility of pregnancy, or circumstances related to pregnancy;
- gender-identity;
- sexual orientation;
- marital or family status;
- source of income;
- political belief, political association or political activity;
- physical or mental disability or related characteristics or circumstances, including reliance on a dog guide or other animal assistant, a wheelchair, or any other remedial appliance or device;
- social disadvantage;
- conviction for an offence for which a pardon has been granted; or
- other prohibited grounds (including physical size and weight) that creates a risk to the health of a worker, detrimentally affects the work environment or leads to adverse job-related consequences for the victims.

"PTE Leadership" means:

- the Managing Director;
- the Artistic Director; and
- the President of the Board of Directors of PTE.

"Sexual Harassment" is a type of harassment and is defined in *The Human Rights Code* (Manitoba) as:

- a series of objectionable and unwelcome sexual solicitations or advances of a sexual solicitation;
- an advance made by a person who is in a position to confer any benefit on, or deny any benefit to, the recipient of the solicitation or advance, if the person making the solicitation or advance knows or ought to reasonably to know that it is unwelcome; and/or
- a reprisal or threat of reprisal for rejecting a sexual solicitation or advance.

PTE also considers sexually oriented behaviour or remarks which create a negative psychological environment to be sexual harassment. Such behaviour or remarks include:

- unwelcome, degrading, vulgar and/or demeaning remarks, jokes, language, advances or propositions based on or connected to sex or gender;
- written or verbal abuse or harassment of a sexual nature;
- inappropriate comments about clothing, physical characteristics or activities;
- inappropriate displays of sexual pictures or materials;
- demanding or requesting sexual favours in exchange for favourable reviews, shifts, promotions or continued employment;
- refusing to work with or have contact with a person because of their sex, gender or sexual orientation;
- leering, ogling, or suggestive or insulting sounds; and/or
- unwanted questions or comments about one's private life, sex life and/or sexual preferences.

"Unlawful Discrimination" means:

- differential treatment of someone on the basis of their actual or presumed membership in or association with some class or group of persons, rather than on the basis of personal merit; or
- differential treatment of someone on the basis of a Protected Characteristic; or
- differential treatment of someone on the basis of their actual or presumed association with someone else whose identity or membership is determined by a Protected Characteristic; or
- failure to make reasonable accommodation for the special needs of someone if those special needs are based upon a Protected Characteristic.

Discrimination includes any act or omission that results in discrimination as defined above, regardless of the form of the act or omission, and whether or not the person responsible for the act or omission intended to discriminate.

Discrimination includes failing to reasonably accommodate to the point of undue hardship a person's special needs based upon a Protected Characteristic.

"Workplace Violence" constitutes any action, conduct, threat or gesture of a person towards someone in the workplace that can reasonably be expected to cause harm, injury or illness to that person. It includes but is not limited to actual or attempted physical force against a person, or any threatening statement that gives a person reasonable cause to believe that physical force will be used against them or another person.

PTE is committed to ensuring so far as is reasonably practicable that no one is subjected to workplace violence, will ensure all persons are aware of the risks of workplace violence and are properly trained and equipped to protect themselves. As such, it is committed to:

- providing a safe, healthy and violence-free workplace, to the extent reasonably practicable;
- dedicating sufficient attention, resources and time to address factors that contribute to workplace violence including, but not limited to, bullying, teasing, and abusive and other aggressive behaviour and to prevent and protect against it;
- communicating information in its possession about factors contributing to workplace violence;
- training persons involved with PTE on this policy;
- ensuring persons involved with PTE comply with this policy; and
- assisting persons involved with PTE who have been exposed to workplace violence.

HOW TO REPORT WORKPLACE HARASSMENT OR DISCRIMINATION

Given the sensitivity of these matters, PTE will do its best to preserve confidentiality throughout the process during an investigation, and will not disclose the name of any complainant(s) or respondent(s) unless necessary to investigate a complaint or take corrective action, or where required by law. If personal information must be disclosed it will be the minimum amount necessary for the purpose.

If you are a witness to but not the victim of workplace harassment or discrimination, you are requested and encouraged to take action. This can be by:

- approaching the respondent(s), clearly identifying the unwelcome behaviour, and requesting it to stop (if you are comfortable doing this);
- approaching the victim(s) and encouraging them to address things as per this policy;
- approaching any member of PTE Leadership to informally report the behavior; and/or
- making a formal written complaint to any member of PTE Leadership.

If you are a victim to workplace harassment or discrimination, you are requested and encouraged to take action. This can be by:

- approaching the respondent(s), clearly identifying the unwelcome behaviour, and requesting it to stop (if you are comfortable doing this);
- approaching any member of PTE Leadership to informally report the behavior; and/or

- making a formal written complaint to any member of PTE Leadership.

To help us address things promptly and effectively a witness or victim who is making an informal report or formal complaint should preferably do so as soon as reasonably possible, and include the following information:

- the date(s) and time(s) of each incident you are reporting;
- the name(s) of the person(s) involved;
- the name(s) of any witness(es);
- a detailed description of what occurred.

PTE Leadership will deal with complaints informally or formally, but all complaints will be taken seriously and dealt with fairly and promptly.

There may be a discussion with any respondent(s) or a mediation (where a neutral third party helps the people involved reach an acceptable solution). If the informal route does not succeed or is not appropriate in the circumstances, there may be a formal investigation into the complaint.

Anyone involved is expected to cooperate reasonably in the process.

Any investigation will be performed by a Competent Person designated by PTE Leadership. The expectation is the designated Competent Person will in most cases be the Managing Director although that may change depending on the circumstances.

The complainant(s) and the respondent(s) are entitled to a fair and respectful process, but the Competent Person will determine their own procedures, determine who will be interviewed, and provide a confidential written report for PTE Leadership.

Throughout, the Competent Person will keep the complainant(s) and the respondent(s) advised of the process and progress of the investigation.

PTE Leadership will in writing advise the complainant(s) and the respondent(s) of the results of the investigation and provide a summary, but not the complete investigation report.

PTE will take decisive and suitable action in response to:

- anyone found to have engaged in conduct constituting harassment, unlawful discrimination, or workplace violence; or
- anyone who takes or threatens a reprisal, or knowingly makes a false complaint or provides false information regarding a complaint.

Such person will (regardless of their position or seniority) face appropriate disciplinary action up to and including dismissal and/or removal, and such other action as reasonably required to ensure a positive environment in which everyone is treated with respect and dignity, and that is free of harassment, unlawful discrimination and workplace violence.

Given the sensitivity of these matters, all involved are required to do their best to preserve confidentiality. Confidentiality extends to the complainant(s) and respondent(s), subject to disclosure to immediate family (on a confidential basis) or for the purpose of obtaining legal advice.

PARTICULAR PROCEDURES REGARDING INCIDENTS OF VIOLENCE

In the event immediate assistance is required when an incident of violence occurs or is likely to occur, please do not hesitate to call 911 and summon help immediately.

Everyone should take all reasonable steps to protect their personal safety and remove themselves from a violent situation if possible.

Persons must report incidents of violence to a member of PTE Leadership immediately, so that the risk associated with the situation can be assessed and a documented incident report prepared.

The documented incident report must be prepared within twenty-four (24) hours of the member of PTE Leadership being notified of the violent incident.

The documented report must be completed for all incidents of violence, whether there is actual violence or a threatening situation where there is a reasonable expectation that it may become violent, and regardless of whether there is actual injury.

If a physical assault occurs, the police will likely be contacted.

Incidents of violence will be investigated by a Competent Person as soon as reasonably practicable after the incident, and follow the same procedures regarding interviewing the parties and witnesses as in the case of harassment or unlawful discrimination complaints.

Recognizing that incidents of violence may involve law enforcement, co-operation with law enforcement in any investigation to an incident of violence may be required in the circumstances.

PTE shall, on completion of the investigation into the workplace violence incident:

- keep a record of the report from the Competent Person;
- provide the workplace safety committee or the health and safety representative, as the case may be, with the report of the Competent Person, providing information whose disclosure is not prohibited pursuant to this policy or by law;
- adapt or implement, as the case may be, controls to prevent a recurrence of the workplace violence.

PTE will take decisive and suitable action in response to:

- anyone found to have engaged in conduct constituting harassment, unlawful discrimination, or workplace violence; or
- anyone who takes or threatens a reprisal, or knowingly makes a false complaint or provides false information regarding a complaint.

Such person will (regardless of their position or seniority) face appropriate disciplinary action up to and including dismissal and/or removal, and such other action as reasonably required to ensure a positive environment in which everyone is treated with respect and dignity, and that is free of harassment, unlawful discrimination and workplace violence.

When an actual incident of violence has occurred or when a situation is reasonably expected to become violent, PTE will take the following steps to ensure the safety of all persons who may be at risk:

- PTE Leadership will advise the persons who may be at risk of violence, and review and/or implement procedures in an effort to eliminate or minimize risk to the employee or elected representative, as far as reasonably practicable.
- Unless otherwise prohibited by law, in informing the person(s) of risk, the information will include any information in PTE's possession, including personal information, related to the risk of violence from persons who have a history of violent behaviour and whom workers are likely to encounter in the course of their work. The personal information provided will be the minimum required to accomplish the purpose.

If a person has been the victim of violence, PTE Leadership will:

- encourage the person to get immediate medical help;
- allow the person the opportunity to be examined by a physician; and/or
- encourage the person to attend post-incident counseling, if appropriate.

Should more information be required about this policy, please contact:

Katie Inverarity, Managing Director

katie@pte.mb.ca

(204) 925-5251 (Office) or (204) 333-2945 (Cell)