



HS109 Workplace Violence, Bullying and Harassment Prevention Policy

HS109	Health and Safety	Workplace Violence, Bullying and Harassment Prevention
Handbook Inclusion	Faculty & Staff	
Programs	All	
	Date Created	July 2012
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	Effective Date	February 2026
	Accountable	Leadership Team
Documents/Forms	Appendix 1 – Investigation Form	

1. Policy Statement

Western Community College (WCC) is committed to providing a safe, respectful, and healthy work and learning environment free from workplace violence, bullying, and harassment. Such behaviors are unacceptable and will not be tolerated. This policy is established pursuant to the Workers Compensation Act (WCA) and in accordance with WorkSafeBC Occupational Health & Safety policies.

2. Scope

This policy applies to all employees, faculty, students employed by WCC, volunteers, contractors, and visitors performing work-related activities. It applies to all campuses, work experience sites, off-site college-sponsored events, work-related travel, and electronic communications related to work.

This policy covers workplace violence, including threats, intimidation, and physical assaults, as well as bullying and harassment. Sexual misconduct matters must be addressed under HS104 Sexual Misconduct and Harassment Policy.

3. Definition of Workplace Violence, Bullying and Harassment

3.1 Workplace Violence:

Workplace violence includes the attempted or actual use of physical force against a worker, or any threatening statement or behavior that gives a worker reasonable cause to believe they are at risk of injury. Examples include:

- Physical assault
- Threats of harm (verbal, written, or electronic)
- Intimidating or aggressive behavior
- Shaking fists, destroying property, or blocking movement
- Domestic violence that may expose a worker to harm at the workplace

3.2 Workplace bullying and harassment:

Workplace bullying and harassment includes any unwelcome, or inappropriate conduct or comment by a person toward a worker that the person knew, or reasonably ought to have known, would cause humiliation or intimidation. Examples include:

- Verbal abuse, insults, or yelling (not involving a credible threat of physical harm)
- Spreading malicious rumors or gossip
- Personal attacks or undermining a worker's reputation
- Sabotaging a worker's performance or work responsibilities
- Cyber-bullying, including emails or social media harassment
- Intentional exclusion or isolation

Reasonable management action carried out respectfully is not bullying or harassment.

4. Employer Responsibilities

WCC will develop and maintain a written policy statement, take reasonable steps to prevent or minimize workplace violence, bullying and harassment, establish clear reporting and investigation procedures, inform and train workers, apply and comply with this policy consistently, and conduct an annual review of this policy and procedures.

WCC will also take immediate action to protect workers if workplace violence or threats of violence are reported.

5. Reporting Procedures

Immediate Threats: If there is an immediate threat of violence, workers must contact emergency services (911) and campus security (if applicable) before reporting through internal channels.

Workers are encouraged to report workplace violence, bullying, or harassment as soon as possible, preferably within 30 days of the incident, to:

- HR Director (hr@wcc.ca)
- The President, or Vice-President if HR is involved.
- If the President or Vice President is the respondent, reports may be made to the Leadership Team or an external investigator.

Reports should include:

- Dates of incidents
- Description of conduct
- Individuals involved
- Witnesses, if any

Anonymous reports will be reviewed where possible, but limitations may apply. Violent incidents will be treated urgently, and WCC may implement **immediate safety measures**.

6. Investigation Procedures

6.1 Intake and Initial Assessment

Upon receiving a complaint, HR, President or member of the Leadership Team will:

1. **Acknowledge receipt** of the complaint within **3 business days**.
2. **Assess jurisdiction** (whether the conduct falls under this policy).
3. **Assess immediate risk** to health and safety (including risk of violence), and implement interim measures if required (e.g., schedule changes, separation of parties, temporary remote work). For violent incidents, WCC may immediately involve police or emergency services.
4. **Determine investigation pathway**, including:
 - Informal resolution (if appropriate and agreed to by both parties), or
 - Formal investigation.

If a formal investigation is required, the HR Director, President, or designated will **appoint the Investigation Team** (Committee of three members or an external investigator, as outlined in Section 6.2).

If the complaint does not fall under this policy, the complainant will be informed in writing within 5 business days and referred to the appropriate process.

Investigations will be fair, impartial, and typically completed within 30 calendar days, unless complexity requires extension, in which case both parties will be informed of the revised timeline.

6.2 Appointment of Investigators

WCC will appoint an investigation body that is impartial, independent, and free from any real or perceived conflict of interest.

Default Investigation Team:

In most cases, an internal Investigation Team of three (3) members will be appointed, normally consisting of:

- A Human Resources representative;
- A neutral Supervisor or peer employee who is not involved in the complaint; and
- A neutral manager or representative from another department who is not connected to the matter.

Eligibility and Conduct Requirements:

All members of the Investigation Team must:

- Be impartial and, where possible, trained in workplace investigations;
- Have no real or perceived conflict of interest;
- Act independently, in good faith, and fairly throughout the investigation;
- Maintain strict confidentiality; and
- Be sensitive to the interests of all parties.

Substitute Appointment (Internal Team)

Where an internal Investigation Team member cannot participate due to involvement in the complaint or a conflict of interest, a Leadership Team member may be appointed solely as a substitute.

This substitution cannot be used if the complaint involves any Leadership Team member, including the President or Vice President. Substitute members will not review or approve the final decision of the Investigation Team.

Use of External Investigators (Discretionary)

Where neutrality, specialized expertise, or the seriousness or complexity of the matter requires, WCC may appoint an external investigator to replace or supplement the Investigation Team.

Mandatory External Investigator (Leadership Involvement)

Where a complaint involves any member of the Leadership Team, including the President or a Vice President, WCC will appoint an external, independent investigator.

In these circumstances:

- No internal manager, HR staff member, or executive will act as an investigator;
- The non-involved executive (if any) will retain procedural oversight only; and
- The external investigator will conduct all fact-finding and prepare the findings report.

6.3 Investigation Planning

The investigation Team will:

- Provide written notice of the complaint to the respondent and an opportunity to respond.
- Meet separately with each party to explain:
 - the investigation process and expected timeline;
 - the Roles and responsibilities of those involved;
 - the Confidentiality of the investigation; and
 - any interim measures to protect employees and limit the risk of workplace violence, bullying, or harassment, if required.
- Review evidence with focus on determining whether the conduct meets the definition of workplace violence, bullying, or harassment, in accordance with WorkSafeBC OHS Policies:
 - If both parties agree on the details of the incident, the investigator will review the available evidence and determine whether workplace violence, bullying, or harassment occurred.
 - If the parties do not agree, all allegations and issues must be thoroughly examined, keeping the focus on gathering facts and evidence.
- Gather Evidence, including:
 - Interviews of the complainant, respondents and witnesses (if applicable),
 - Review of relevant documents, emails, handwritten notes, photographs, policies, logs, video, medical or security reports, or any other physical evidence related to the incident.
- Incorporate any request from parties for support or accommodation during the investigation.
- Determine an estimated timeline to reach findings and inform parties if the timeline must be extended beyond the standard 30 calendar days.

6.4 Evidence Collection

The investigation Team will:

- Conduct respectful and confidential interviews
- Review all relevant documentation and evidence
- Maintain detailed, confidential notes

- Allow parties to submit additional evidence before finalizing findings

If both parties agree on the events, WCC may limit further investigation and determine appropriate corrective action.

6.5 Findings and Communication of Decisions

The Investigation Team will prepare a **written findings report**, including:

- Summary of allegations: clearly outline what was reported, by whom, and the context.
- Evidence reviewed: list of documents, emails, witness statements, interviews, and any other materials considered.
- Findings of fact: describe what occurred, based on the evidence.
- Determination of whether workplace violence, bullying, or harassment occurred (or a combination of these).
- Recommendations for corrective and preventative action: include steps to prevent recurrence, improve processes, or support parties involved.

Possible questions for the investigators to ask:

- What happened, when, where and who was involved?
- How did the complainant respond to the incident?
- Were there witnesses or supporting documentation?
- Were company policies or codes of conduct violated?
- Were there any mitigating or aggravating factors?
- What is the impact on the complainant, respondent, and workplace?
- What corrective or preventive measures are recommended?

Reporting and Confirmation:

Upon completion, the Investigation Team submits its findings and recommendations directly to the President or a Vice President for review of procedural fairness and compliance with policy.

This review by the President or Vice President does not constitute an appeal; it is solely to ensure the investigation process was fair and compliant.

Communication to Parties:

Complainant and respondent will be met separately to explain the investigation's findings, confirming whether the complaint was:

- Substantiated: evidence supports the allegations
- Unsubstantiated: evidence does not support the allegations
- Inconclusive: insufficient evidence to determine either way

This will also be informed in writing to both parties.

For substantiated **violence or threats of violence**, WCC may involve law enforcement and impose immediate removal from the workplace.

Specific disciplinary actions will not be disclosed, except as required for implementation, compliance, or legal obligations.

6.6 Timelines

Investigations will normally be completed within **30 calendar days**. Where circumstances require additional time, including involvement of external authorities or complex evidence, both parties will be informed of the reason and revised timeline.

7. Corrective and Preventative Actions

Where workplace violence, bullying, or harassment is substantiated, WCC will:

- Implement **corrective disciplinary action**, including warnings, suspension, or termination, proportionate to the severity of the conduct. For workplace violence or threats of violence, immediate removal from the workplace and involvement of law enforcement may occur, if necessary.
- Apply **preventative measures** such as:
 - Training or coaching,
 - Policy reminders,
 - Work arrangement changes,
 - Mediation (where appropriate),
 - Increased supervision.
- Provide support resources, such as counseling or accommodations, to affected employees.

8. Roles and Responsibilities

WCC as Employer:

- Ensure this policy is implemented and followed.
- Provide a safe, respectful, and healthy work and learning environment.
- Ensure investigations are conducted fairly, promptly, and in compliance with legislation and WorkSafeBC requirements.
- Implement corrective and preventative actions, proportionate to the findings.
- Monitor policy effectiveness, compliance, and follow-up on corrective measures.

President or Vice President:

- Provide executive oversight of all investigations.
- Review investigation findings for procedural fairness and compliance with policy, ensuring the process is conducted fairly, impartially, and according to WCC procedures.
- Ensure interim safety measures are implemented when required.
- Authorize the use of external investigators as applicable.

Human Resources Director / Designate

- Receive and intake complaints.
- Assess jurisdiction and immediate safety risks.
- Implement interim safety measures.
- Coordinate investigations and ensure proper documentation.
- Maintain confidentiality of records.
- Monitor investigation timelines and adherence to policy.

Employees / WCC community members:

- Treat others with dignity, respect, and fairness.
- Promptly report incidents of workplace violence, bullying, or harassment.
- Cooperate with investigations.
- Refrain from retaliatory behavior.

Supervisors / Managers:

- Model respectful, professional behavior.
- Report observed or suspected incidents of workplace violence, bullying, or harassment.
- Support employees and students who raise concerns.
- Cooperate with investigations and implement interim measures when directed.

Investigators:

- Conduct impartial, fact-based investigations.
- Gather and assess all relevant evidence.
- Interview with parties and witnesses respectfully and confidentially.
- Maintain strict confidentiality.
- Prepare written findings and recommendations.
- Act independently and free from conflicts of interest.

External investigators, if hired, will have clearly defined roles and responsibilities, following the general responsibilities of the Investigation Team.

9. Follow-Up and Monitoring

- The affected parties will be advised of the investigation findings by HR Director.
- Appropriate corrective actions will be taken within a reasonable time frame.
In required circumstances, employees may be referred to the employee assistance program or be encouraged to seek medical advice.
- Follow-up check-ins will occur within 30-60 days after corrective actions.
- The workplace will be monitored to ensure behavior has ceased.
- Retaliation will not be tolerated.
- Support resources may be offered, and additional preventative measures will be implemented if needed.

10. Confidentiality

All investigations will be handled confidentially, shared only information on a need-to-know basis, in accordance with FIPPA.

11. Protection from Retaliation

No worker will suffer retaliation for reporting incidents, participating in an investigation, or supporting a complainant. Retaliation will be treated as a serious policy violation and will be addressed accordingly.

12. Training

All workers and supervisors will receive training in recognizing workplace violence, bullying, and harassment, reporting procedures, investigation processes, and responsibilities under this policy. Training will be documented and included in the onboarding process.

13. Annual Review

- The Leadership Team and HR will review this policy annually.
- Revisions will be documented and communicated to all employees.
- Policy copies will be available on the WCC website and HR system.

14. Record-keeping requirements

- Employees should maintain written accounts of incidents for complaints.
- WCC will keep written records of investigations, including:
 - Names of parties involved;
 - Complaint details;
 - Summary of interviews and evidence;
 - Outcomes and findings.
- Records will be securely maintained in accordance with **privacy legislation** and WCC retention policies.
- An **Investigation Form** (Appendix 1) will be used for documentation.

Appendix 1 Investigation Form

Western Community College Investigation Form

The following investigation form is being used when investigating workplace violence, bullying, or harassment complaints or incidents.

Name of complainant
Name of respondent
Date
Location
Name of Investigator(s)
Person interviewed
Description of the Situation (where and when, what was said or done, etc.). Also describe any feelings reported (e.g., humiliated, intimidated)
Person interviewed
Description of the Situation (where and when, what was said or done, etc.). Also describe any feelings reported (e.g., humiliated, intimidated)

Person interviewed
Description of the Situation (where and when, what was said or done, etc.). Also describe any feelings reported (e.g., humiliated, intimidated)

Based on the investigation, did workplace bullying and harassment occur?

Yes ____ No ____

Reason(s) for this conclusion

