

SEXUAL VIOLENCE POLICY

Name of Policy: Sexual Violence Policy

Implementation date: Oct 27, 2016

Date of last revision: January 7, 2019

Position(s) Responsible: Onsite Administrator

Sexual Violence Policy

In March 2016, Ontario passed legislation which strengthens provisions related to sexual violence and harassment. In accordance with Bill 132, Sexual Violence and Harassment Action Plan Act, Lighthouse Labs has adopted this Sexual Violence policy, in compliance with: Bill 132, Schedule 5, PCC, 2005, s.32.1, and O. Reg. 415/06, s.36.0.

Lighthouse Labs is dedicated to providing an educational experience free of sexual violence. The *Private Career Colleges Act, 2005* defines “sexual violence” as any sexual act or act targeting a person’s sexuality, gender identity or gender expression, whether the act is physical or psychological in nature, that is committed, threatened or attempted against a person without the person’s consent, and includes sexual assault, sexual harassment, stalking, indecent exposure, voyeurism and sexual exploitation.

This Sexual Violence Policy outlines Lighthouse Labs’ reporting, investigative and disciplinary responses to reports of sexual violence made by its students while undergoing their educational program at Lighthouse Labs.

Upon request, Lighthouse Labs shall provide or make available training on its sexual violence policy to the following persons:

- a. Corporate directors, controlling shareholders, owners, partners and other persons who manage or direct the affairs of Lighthouse Labs, and their agents
- b. Instructors, staff and other employees and contractors of Lighthouse Labs
- c. Students enrolled at Lighthouse Labs

Procedure

These are the details of Lighthouse Labs’ process for responding to and addressing incidents and/or complaints regarding sexual violence.

Reporting

1. Any student who has been affected by sexual violence or who needs information about support services should contact the Onsite Administrator.

2. Within 5 business days, the Onsite Administrator will notify the General Manager and Director of HR and a meeting will be arranged with the student who presented the issue to discuss the concern(s) as soon as possible, with the option of filling out a sexual violence report.

A student may choose not to request an investigation and has the right not to participate in any investigation that may occur. A student also has the option to fill out the report anonymously.

3. Lighthouse Labs will allow the student to have a person present with them at every stage of the process.
4. Following the meeting with the individual, the General Manager and Director of HR will work together to:

- a. Appropriately accommodate the needs of the students and staff affected by the complaint or incident
- b. Discuss with the student the supports and services that are available (See Appendix)
- c. Inform the student that a formal report of an incident of sexual violence is not necessary to access supports, services, or accommodations
- d. Respect that a student may choose not to request an investigation, and has the right not to participate in any investigation that may occur
- e. Keep all personal information of persons involved confidential where legally possible, except in those circumstances where it believes an individual is at imminent risk of self-harm, or of harming another, or there are reasonable grounds to believe that others on its campus or the broader community are at risk.

To ensure privacy, all complaints, reports and information gathered will be only available to those who need to know for purposes of investigation, implementing safety measures and other circumstances that arise from any given case

- f. In certain circumstances, Lighthouse Labs may be required by law to initiate an internal investigation and/or inform police without the students' consent, if it believes the safety of members of its community or the broader community is at risk.
5. After the initial meeting, the Director of HR will make the decision to conduct whether any further enquiries and/or investigations are necessary.
 6. Any necessary inquiries or investigations shall be completed within 5 business days of the initial meeting with the student.

Investigating Reports of Sexual Violence

Our process is to ensure that the student bringing the concern forward is heard, supported (by us and outside services if necessary), accommodated, and is given full transparency of the escalation process as it unfolds and a resolution is determined. Our priority is to ensure everyone is treated fairly and respectfully throughout the process.

1. Any student may file a report of an incident or complaint to the Onsite Administrator in person or in writing.
2. The CEO & Partners will be notified about the complaint by the Director of HR.
3. The General Manager and Director of HR will arrange to meet with the student to discuss the complaint within five business days of receiving the student's written or verbal complaint.
 - a. A student can have a person present with them at all stages of the proceedings.
4. The Director of HR will determine whether an investigation should proceed and if the student wishes to participate in the investigation.
5. If the Director of HR determines an investigation is required, they will determine:
 - a) Who should conduct the investigation
 - b) Whether the incident should be immediately referred to the police
 - c) What interim measures should be put into place immediately
6. Once an investigation has started:
 - a. All involved parties will be advised that they may ask another person to be present throughout the investigation
 - b. The student will be interviewed to ensure a complete understanding of the complaint, including any pertinent details that were not included in the initial written complaint.
 - c. The Respondent will be informed of the complaint, given details of the allegations, interviewed, and given an opportunity to respond to the allegations and to provide any witnesses the Respondent feels are essential to the investigation.
 - d. Any other identified person who may have knowledge of the incident or witnesses will be interviewed.
 - e. All involved parties will be provided with updates about the status of the investigation.
7. Upon a further understanding of the situation and after considering all factors, a decision will be made regarding the next warranted course of action. If it is determined that sexual violence

has occurred, Lighthouse Labs may immediately take any action they deem appropriate, up to and including:

- a. Termination of contract/employment of instructors or staff
- b. Suspension or expulsion of student(s)
- c. Referral to police
- d. Any other actions that may be appropriate given the circumstances

Any form or perceived retaliation from individuals following the resolution of a complaint, regardless of the outcome, will not be tolerated.

Appeal

1. Any party involved in a sexual violence incident may appeal the decision from the investigation.
2. All appeals must be made in writing to the CEO within 5 business days of receiving the decision, stating their intent to appeal as well as any rationale for an appeal.
3. The CEO will review the intent to appeal and respond within 5 business days outlining the next steps, which could include (but are not limited to), reviewing the information gathered during the investigation and meeting with each of the involved parties.

Collection of Student Data

1. Lighthouse Labs shall collect from its students and other persons, and provide to the Private Career Colleges Superintendent, the data as required by the Private Career Colleges Act.

Policy Review

Lighthouse Labs will review this policy in collaboration with its community, including student input every 3 years. The next review will be January 7, 2022.

Appendix: List of Support Services & Resources

City	Organization	Contact
Toronto	<p>Assaulted Women’s Helpline</p> <p>A free, 24-hour, 7-day-a-week crisis counselling, emotional support, information and referrals via telephone to individuals (including men) living in Ontario – anonymous and confidential. Services available in up to 200 languages.</p>	<p>GTA 416.863.0511 GTA TTY 416.364.8762 TOLL-FREE 1.866.863.0511 TOLL-FREE TTY 1.866.863.7868 <i>Bell, Rogers, Fido or Telus mobile phone #SAFE (#7233)</i></p>
Toronto	<p>Women’s College Hospital Sexual Assault/Domestic Violence Care Centre (SA/DVCC)</p> <p>Acute care for those assaulted within the past week. Centre support available 24 hours a day, seven days a week. Support for cis- women and cis-men as well as trans people who have experienced sexual assault and/or intimate partner violence. You do NOT have to choose to involve police to access this service.</p>	<p>Phone: 416-323-6040</p> <p>Web: womenscollegehospital.ca/programs-and-services/sexual-assault-domestic-violence-care-centre</p>
Vancouver Victoria	<p>VictimLink BC</p> <p>A toll-free 24/7 information and support line that provides information and referrals to all victims of crime, and crisis support to victims of family and sexual violence, including sexual assault, violence in relationships, elder abuse, and adult survivors of physical or sexual abuse. VictimLink BC provides service in 110 languages, including 17 North American Aboriginal languages.</p>	<p>Phone: 1-800-563-0808</p> <p>24 hours every day</p>
Vancouver	<p>Sexual Assault Service</p> <p>We provide care to anyone from any province or country. When you arrive at the emergency department ask for the Sexual Assault Service. All services are free and confidential. No Carecard (MSP) is needed.</p>	<p>Go to Vancouver General Hospital's Emergency Department (24 hours) 920 West 10th Avenue OR UBC Hospital's Urgent Care Centre Koerner Pavilion, 2211 Wesbrook Mall. 8:00am-10:00pm Our team is on-call 24/7 every day</p>

Calgary	<p>Connect Family & Sexual Abuse Network</p> <p>One phone call connects you to Calgary’s network of services and support. Provides access to comprehensive services and support for those impacted by domestic violence, sexual violence and sexual abuse.</p>	<p>24-hour crisis line: 403-237-5888</p> <p>toll-free 1-877-237-5888</p>
Calgary	<p>Sexual Assault Response Team (SART)</p> <p>The 24-hour Sexual Assault Response Team (SART) is a collaborative partnership between CCASA, Alberta Health Services – Calgary Region, Calgary Police Service, area RCMP, and the Crown Prosecutor’s office. This crisis response team provides specialized care to individuals who have been sexually assaulted within the past 96 hours.</p>	<p>The SART team is available 24 hours at the Sheldon Chumir Hospital</p> <p>1213 4 St SW, Calgary</p>
Montreal	<p>Montreal Sexual Assault Centre/Centre pour les victimes d’agression sexuelle de Montréal</p> <p>Specially trained caregivers will receive your call, listen to you, determine your needs and help you to decide what to do next.</p>	<p>Montreal 514 933 9007</p> <p>Toll-free provincial helpline 1-888-933-9007</p>
Montreal	<p>CLSC Metro and the Montreal General Hospital</p> <p>CLSC Métro and the Montreal General Hospital, is a designated centres in Montreal. The designated offering confidential services to victims of sexual assault 24 hours a day, seven days a week.</p>	<p>Monday to Friday: 8 a.m. - 5 p.m. CLSC Métro 1801 de Maisonneuve Blvd. West 3rd floor, Montreal, Quebec (French and English)</p> <p>Monday to Friday: 5 p.m. - 8 a.m. Weekends and holidays: 24 hours Montreal General Hospital 1650 Cedar Ave., Montreal Emergency room: Pine Avenue entrance (corner of Côte-des-Neiges) (English only)</p>