



POLICY	SAFE AND RESPECTFUL WORKPLACE POLICY
Owner: Human Resources	Approved Date: August 10, 2021

1.0 POLICY STATEMENT

Alberta Blue Cross is committed to protecting and maintaining the health and safety of Alberta Blue Cross workers at the workplace. It is committed to providing its workers with a safe and respectful workplace that is free from harassment and violence. All individuals are required to conduct themselves in a professional manner at any location where a worker is engaged in work, or work-related activities, for Alberta Blue Cross including virtual environments, or, and refrain from engaging in harassing or violent behavior.

This Policy is not intended to discourage or prevent a worker from exercising any other rights, actions or remedies that may be available under the *Alberta Human Rights Act* or the *Occupational Health and Safety Act*. A worker has the right to file a complaint where the harassing incident is based upon human rights grounds with the Alberta Human Rights Commission.

Any questions about this Policy or its related procedures should be directed to the Vice President People, Wellness and Innovation.

2.0 PURPOSE OF POLICY

The purpose of this Policy is:

- (a) to create a safe and respectful workplace, and to protect and maintain the health and safety of Alberta Blue Cross workers at the workplace – whether it is on-site or virtual;
- (b) to comply with the statutory requirements under human rights legislation to prohibit workplace harassment based on certain enumerated grounds of discrimination;
- (c) to comply with statutory requirements under occupational health and safety legislation to ensure:
 - (i) the health, safety and welfare of workers engaged in work for Alberta Blue Cross; and
 - (ii) that no Alberta Blue Cross worker is subjected to, or participates in, harassment or violence at the Alberta Blue Cross workplace – whether it is on-site or virtual.

3.0 SCOPE

This Policy applies to all Alberta Blue Cross workers at any location (including virtual) where a worker is engaged in work or work-related activities for Alberta Blue Cross. All Alberta Blue Cross workers have a role in preventing and reporting workplace harassment and violence. All workers are responsible for working in compliance with this Policy and are required to report any incidents of workplace harassment or violence to Alberta Blue Cross.





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This Policy also applies where harassment or violence is connected to the Alberta Blue Cross workplace but arises outside of the workplace or outside of working hours if the harassment or violence either detrimentally affects the Alberta Blue Cross workplace or leads to adverse job related consequences to the victim.

4.0 DEFINITIONS

harassment means engaging in a course of vexatious comment or conduct that is known or ought to reasonably be known to be unwelcome and includes:

- (a) discriminatory harassment, which targets an individual or group of individuals based upon characteristics protected under the *Alberta Human Rights Act*, including race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender (including sexual harassment), gender identity, gender expression and sexual orientation; and
- (b) any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the worker’s health and safety, and includes:
 - a. conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and
 - b. a sexual solicitation or advance,

but does not include any reasonable conduct of Alberta Blue Cross or a supervisor in respect of management of workers or a workplace. Performance reviews, work evaluation and reasonable disciplinary measures do not constitute harassment.

violence, whether at the workplace or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence. Examples of violence include, but are not limited to, threats of physical harm, psychological attacks, harassment, intimidation, fighting, assault, sexual assault, forcible confinement, possession of a dangerous weapon, destruction of property and robbery.

worker means a person engaged in an occupation, including a person who performs or supplies services for Alberta Blue Cross and includes all Alberta Blue Cross employees and contractors.

workplace means the location or virtual environment where an Alberta Blue Cross worker is, or is likely to be, engaged in work or work-related activities for Alberta Blue Cross and includes virtual environments (for e.g., WebEx, Zoom, Teams, etc.) and any vehicle or mobile equipment used by a worker in an occupation.



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5.0 KEY PRINCIPLES AND POLICY REQUIREMENTS

- 5.1 Alberta Blue Cross prohibits and will not tolerate any form of harassment, violence or discrimination by any Alberta Blue Cross worker, member of management or third party, including vendors, customers, or visitors, regardless of whether it is:
- verbal (for example, derogatory statements, racial slurs, derogatory comments or jokes, unwelcome sexual advances or requests for sexual favors);
 - physical (for example, assault or inappropriate physical contact);
 - visual (for example, displaying derogatory or sexually suggestive posters, cartoons or drawings, leering or making sexual or derogatory gestures); or
 - online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).
- This list is illustrative only, and not exhaustive.
- 5.2 Alberta Blue Cross will proactively make every reasonable, practicable effort to ensure:
- (a) the health, safety and welfare of workers engaged in work for Alberta Blue Cross, those workers not engaged in work for Alberta Blue Cross but present at an Alberta Blue Cross workplace (including virtual) at which that work is being carried out, and other persons in the vicinity of the work site whose health and safety may be materially affected by identifiable and controllable hazards originating from the work site;
 - (b) that workers engaged in the work for Alberta Blue Cross are aware of their rights and duties under the *Occupational Health and Safety Act* and regulations and the *OHS Code*; and
 - (c) that no worker is subjected to harassment or violence at an Alberta Blue Cross workplace.
- 5.3 If Alberta Blue Cross becomes aware of a potential incident of harassment or violence, it will investigate the incident in a fair, timely and confidential manner, in accordance with Alberta Blue Cross' procedures. Alberta Blue Cross is committed to taking appropriate corrective measures to stop any harassment and violence and avoid future incidents.
- 5.4 If an employee needs further assistance dealing with harassment or violence they may contact the Human Resources department, Legal Services or our third party independent hotline (ConfidenceLine) anonymously by dialing 1-866-441-8477 or online by visiting the secure website www.albertabluecross.confidenceline.net.
- 5.5 Alberta Blue Cross will make readily available to workers and the joint health and safety committee:
- (a) information related to work site hazards, controls, work practices and procedures; and
 - (b) up-to-date copies of the *Occupational Health and Safety Act* and regulations, including the *Occupational Health and Safety Code*.



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6.0 ROLES AND RESPONSIBILITIES

To ensure Alberta Blue Cross workers are provided with a safe and respectful workplace that is free from harassment and violence, the following responsibilities shall be implemented:

6.1 Board of Directors

The Board of Directors is ultimately responsible for Alberta Blue Cross' risk-management policies and practices and plays a crucial role in safeguarding Alberta Blue Cross' corporate values. In exercising its responsibility, the Board:

- (a) oversees Management developing and implementing programs and procedures to eliminate, reduce or control harassment and violence and to ensure that these programs remain adequate, comprehensive and prudent; and
- (b) reviews and approves material changes to this Policy.

6.2 Governance and Compensation Committee

In exercising its responsibility for assisting the Board of Directors in fulfilling its governance and supervisory responsibilities for oversight of Alberta Blue Cross' human capital, the Governance and Compensation Committee is responsible for periodically receiving reports from Management to ensure:

- (a) programs and procedures are implemented to eliminate, reduce or control harassment and violence; and
- (b) that these programs remain adequate, comprehensive and prudent.

6.3 Executive Management

The *Occupational Health and Safety Act* requires that Alberta Blue Cross establish a joint health and safety committee. Executive Management will ensure that:

- (a) a committee is established for this purpose or that an existing committee is assigned this responsibility; and
- (b) membership and meetings of the Committee comply with the *Occupational Health and Safety Act* and related regulations, where specified.

6.4 Joint Health and Safety Committee

This Committee is responsible for implementing the Policy and related processes and procedures that include, at a minimum, the requirements regarding the health and safety of workers as set out in the *Occupational Health and Safety Act* and related regulations.

6.5 Management and Workers

Management are responsible for:

- (a) proactively promoting a workplace free of harassment and violence; and
- (b) ensuring that workers are aware of the harassment and violence prevention measures that pertain to their work and mechanisms available to report such incidents; enforcing compliance with this Policy.



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All workers must:

- (a) be familiar with and in compliance with this Policy at all times;
- (b) refrain from causing or participating in harassment or violence; and
- (c) report any incidents of workplace harassment or violence.

6.6 Internal Audit

Internal Audit shall periodically evaluate compliance with the terms of this Policy.

7.0 ENFORCEMENT

All workers are required to read and comply with the terms of this Policy. Any violation of this Policy or its related procedures by an employee may be grounds for disciplinary action, up to and including termination of employment. Any violation of this Policy by a contractor may be grounds for termination and/ or removal from the workplace.

8.0 RELATED DOCUMENTS AND LEGISLATION

1. *Alberta Human Rights Act*, R.S.A. 2000, c. A-25.5;
2. *Occupational Health and Safety Act*;
3. *Criminal Code*, R.S.C. 1985, c. C-46;
4. Safe Disclosure Policy;
5. Work Style Policy;
6. Violence Prevention Procedures; and
7. Workplace Harassment and Bullying Procedures.

9.0 POLICY GOVERNANCE

Description of Action	Date	Policy Owner
Approved by the Board	August 10, 2021	Vice-President, People, Wellness & Innovation

10.0 REVIEW CYCLE

Original approval date:	August 2018
Review dates:	August, 2021
Next renewal date:	August, 2024
Frequency of review:	Every 3 years