Binder	PCL Human Resource Policies	Number	5.05
Section	Employee Relations	Page	1 of 4
Subject	Human Rights	Effective	August 13, 2026
Issued to	All Employees, Volunteers, Students, Placement Students, Applicants and Contractors	Replaces	5.05 dated Apr 22/15, Jan 1/19 Mar 8/24
Issued by	Chief Executive Officer		

1. POLICY

1.01 PCL is committed to providing an inclusive, respectful, accessible, and discrimination-free environment where all people are treated with dignity and respect. This commitment supports PCL's organizational standards, person-centred practices, and responsibility to foster a healthy workplace culture.

1.02 In accordance with Ontario's *Human Rights Code*, PCL prohibits discrimination, harassment, sexual harassment, and reprisal based on any protected ground or combination of protected grounds, including age, ancestry, citizenship, colour, creed, disability, ethnic origin, family status, gender expression, gender identity, marital status, place of origin, race, record of offences, sex, and sexual orientation.

1.03 PCL will provide accommodation in accordance with the *Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), up to the point of undue hardship.

1.04 This policy applies to all aspects of employment and engagement with PCL, including recruitment, hiring, orientation, training, work assignments, performance management, discipline, compensation, advancement, accommodation, and conditions of work or volunteer placement.

2. PURPOSE

2.01 The purpose of this policy is to outline PCL's commitment to preventing and addressing discrimination, harassment, sexual harassment, and reprisal, and to identify the responsibilities and procedures used to support a respectful, inclusive, accessible, and legally compliant environment.

3. SCOPE

3.01 This policy applies to all PCL employees, volunteers, students, placement students, applicants, contractors, visitors, and others who perform work, provide services, participate in programs, or otherwise engage with PCL.

3.02 This policy applies in the workplace, during work-related activities, at PCL events, during training or meetings, while using PCL communication systems, and in any situation where conduct may affect the work environment, volunteer environment, services, or supports provided by PCL.

4. RESPONSIBILITY

4.01 All employees, volunteers, students, placement students, applicants, contractors, and others engaged with PCL are responsible for contributing to a respectful, inclusive, accessible, and discrimination-free environment.

4.02 All individuals covered by this policy are expected to conduct themselves in a manner consistent with PCL's values and organizational standards, and to avoid behaviour that may discriminate, harass, humiliate, exclude, intimidate, or create barriers for others.

4.03 Employees, volunteers, students, and placement students are responsible for reporting concerns that may undermine this policy to their supervisor, director, Human Resources, or another appropriate member of management.

4.04 Supervisors, managers, directors, and Human Resources are responsible for taking concerns seriously, responding promptly, maintaining confidentiality to the extent possible, supporting accommodation processes, documenting steps taken, and ensuring that appropriate follow-up or corrective action occurs.

4.05 PCL is responsible for maintaining policies, procedures, training, and practices that support compliance with applicable legislation and promote a healthy, inclusive, accessible, and person-centred workplace culture.

5. DEFINITIONS

Accommodation: An individualized process of removing barriers or making adjustments to policies, practices, work duties, schedules, communication methods, physical spaces, or other requirements to support equal participation, unless doing so would cause undue hardship.

Discrimination: Any form of unequal treatment based on prohibited grounds. Discrimination can be direct or indirect, intentional, or unintentional, but in all cases has the effect of disadvantaging an individual or group.

Harassment: Engaging in a course of vexatious comment or conduct that is known or ought to be known to be unwelcome. Harassment can also include a single, severe incident.

Reprisal: Actions or threats intended to retaliate against an individual for claiming or enforcing a right under Ontario's Human Rights Code.

Sexual harassment: Harassment that is based on sex, sexual orientation, gender expression, or gender identity. Sexual harassment includes where an employee in a position of power makes a sexual solicitation or advance or threatens reprisal if a sexual solicitation or advance is rejected.

Poisoned work environment: A workplace or service environment where comments, conduct, or practices related to a protected ground create a hostile, demeaning, intimidating, or exclusionary environment, even if the behaviour is not directed at one specific person.
Undue hardship: The legal limit on the duty to accommodate. In Ontario, undue hardship is assessed using the factors set out in the *Human Rights Code*, including cost, outside sources of funding, if any, and health and safety requirements, if any.

6. REFERENCES AND RELATED STATEMENTS OF POLICY AND PROCEDURE

Ontario Human Rights Code
Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
HR Policy 6.09 Workplace Violence and Harassment
HR Policy 5.06 Integrated Standard AODA
HR Policy 6.08 Return to Work

7. PROCEDURE

7.01 All new hires, volunteers, students, and placement students will review this policy during orientation. Additional review or training may be provided as required by PCL, applicable legislation, or identified organizational needs.

7.02 All individuals covered by this policy are expected to behave in a manner consistent with this policy and PCL's organizational standards.

7.03 Anyone who experiences or witnesses conduct that may be inconsistent with this policy is encouraged to report the concern as soon as possible to their supervisor, director, Human Resources, or another appropriate member of management. If the concern involves the person who would normally receive the report, the individual may report to another appropriate supervisor, director, or Human Resources.

7.04 Complaints should include as much relevant information as possible, such as the date, time, location, individuals involved, witnesses, description of the concern, and any related documents or communications. PCL may also act on concerns where a written complaint has not been submitted.

7.05 PCL will respond to concerns promptly, fairly, and in a manner appropriate to the circumstances. This may include preliminary review, informal resolution where appropriate, investigation, accommodation review, corrective action, or referral to another applicable policy or process.

7.06 PCL will maintain confidentiality to the extent possible while ensuring that concerns are properly reviewed, legal obligations are met, and appropriate action is taken. Information will only be shared with those who need to know for the purpose of responding to the concern.

7.07 Reprisal, threats of reprisal, or negative treatment against any person for raising a concern, participating in a process, requesting accommodation, or exercising rights under this policy or the *Human Rights Code* is prohibited.

7.08 Where a concern is substantiated, PCL will take appropriate corrective action, which may include education, coaching, changes to work practices, accommodation measures, discipline, removal from placement or volunteer duties, termination of employment, or other action deemed appropriate.

7.09 Management has an ongoing responsibility to take reasonable steps to stop conduct that undermines this policy, whether or not a formal complaint has been made.