



Policy Title: Human Rights Discrimination and Harassment Policy

Policy Category: Polytechnic Policy

Policy Owner: Associate Vice-President, Anti-Racism, Equity and Human Rights Services

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Related Documents: Human Rights Discrimination and Harassment Procedures, Appendix 1

1. Purpose

The Human Rights, Discrimination and Harassment Policy (“HRDHP”) confirms George Brown’s commitment to promote and protect human rights and provides a complaint resolution process when an alleged breach occurs. The HRDHP aims to:

- Comply with applicable legislation, Ministry directives, and regulatory requirements (see Related Policies);
- Support the proactive creation of an inclusive learning, working, and living environment;
- Describe how to seek support when experiencing discrimination, harassment, or hate;
- Provide clarity and transparency on a complaint resolution process that is procedurally fair and trauma- and violence-informed; and
- Set out potential accountability measures when a community member is found to have breached the HRDHP.

George Brown’s approach to addressing breaches of the HRDHP is, where possible, systemic, remedial, and restorative, and is supported by ongoing education and proactive initiatives that promote equity, diversity, inclusion, accessibility, anti-racism, and Indigenization.

1.1 Introduction

George Brown Polytechnic (“George Brown”) is committed to a learning, working, and living environment free from hate, harassment, and discrimination, where every community member experiences inclusion and belonging. George Brown will continue to take meaningful, deliberate, and sustained action to address discrimination, harassment, and hate in all forms, including as experienced by Asian, Black, Indigenous, Jewish, and Muslim communities, 2SLGBTQIA+ communities, persons with disabilities, women, and all communities protected from adverse treatment under the Ontario Human Rights Code (“Code”)

The *Code* prohibits harassment and discrimination on the following protected grounds: race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy and breastfeeding), sexual orientation, gender identity, gender expression, age (eighteen (18) years or older), marital status, family status, disability, receipt of public assistance (housing only), and record of offences (employment only); the intersection of these grounds; and the failure to accommodate them

1.1 Shared Responsibility

It is the shared responsibility of every member of the George Brown community to foster an environment free from hate, harassment, and discrimination. This responsibility includes understanding what constitutes harassment and discrimination, familiarizing oneself with this Policy and its Procedures (Appendix 1), and cooperating fully with any complaint resolution process undertaken under them.

2. Application and Scope

The HRDHP applies to George Brown community members who are alleged to have:

- Engaged in hate, harassment, discrimination, or reprisal in breach of the HRDHP.
 - Breached confidentiality or interim measures assigned under the HRDHP.
- The HRDHP applies to George Brown community members when engaged in George Brown-related affairs, when:
 - On-campus and in-residence (i.e., the George).
 - In virtual environments, if the activities are related to George Brown affairs, for example, online learning or Blackboard.
 - Off-campus activity where the activity is related to George Brown affairs, is a George-Brown-related function, or where the George Brown community member is representing George Brown. For example, a course, work-integrated experiential learning, organized class activities, or George Brown-sponsored events.
 - The HRDHP may also apply to incidents occurring off campus, whether in person, on social media, or in virtual social environments, where the alleged incident may affect the safety, integrity, and interests of the George Brown community.
 - The HRDHP and related Procedures may continue to apply when a person's relationship with George Brown changes or terminates. Procedures under the HRDHP may be initiated or completed even if the Complainant or Respondent is no longer a George Brown community member.
 - The complaint resolution process set out in the Procedures may be carried out prior to, simultaneously with, or following other internal or external processes or proceedings at the discretion of the Office of Anti-Racism, Equity and Human Rights Services (OAREHRS). The outcome of external proceedings does not necessarily bind George Brown.
 - In the event that a conflict arises between the HRDHP and any relevant collective agreement, the terms of the collective agreement prevail, unless the collective agreement conflicts with George Brown's legislative obligations.
 - The HRDHP applies to alleged incidents of discrimination or harassment that occurred:
 - Within one (1) year of the complaint or report of discrimination or harassment; or
 - If there was a series of incidents, within one (1) year of the last incident in the series.
 - The OAREHRS has the discretion to proceed with a complaint resolution process outside the one (1) year limitation period in appropriate circumstances.

2.1 Internal and External Policies or Proceedings

- Where allegations engage another George Brown policy or process, OAREHRS will determine the appropriate pathway in consultation with the relevant office:
- Allegations of sexual violence are addressed under the *Sexual Harassment and Sexual Violence Policy*.
- Allegations of harassment not based on a protected ground are referred to the appropriate office (for example, Labour Relations, Human Resources, the relevant academic unit, or the Office of Student Conduct and Support).
- Where a complaint engages other George Brown policies, OAREHRS may coordinate or undertake a joint complaint resolution process. Where another office receives a complaint alleging discrimination or harassment on a protected ground, that office will refer that part of the complaint to OAREHRS.
- George Brown community members may also seek a remedy through the Human Rights Tribunal of Ontario, their collective agreement, or the Ontario Ombudsman rather than under the HRDHP

3. Defined Terms

- The following are technical and legal terms defined for the purpose and context of the HRDHP and by applicable law (e.g., the *Code*) to help clarify the HRDHP.

Term	Definition
Advisor	Refers to a Human Rights Advisor employed in OAREHRS (defined below).
Balance of Probabilities	A test used in civil law that asks, “based on the evidence presented, is it more likely than not that an action that is alleged took place?”
Community Members	<p>Includes current registered George Brown students, faculty, staff (whether or not employees), management, volunteers, visitors (including guest speakers), advisory committee members, governors, and other groups that George Brown formally recognizes.</p> <p>It also includes organizations at which George Brown students are placed (“Placement Organizations”) and organizations that provide goods and services to George Brown (“Vendors”).</p>

Term	Definition
Complainant	A current George Brown community member who makes a complaint under the HRDHP. George Brown may be a complainant.
Discrimination	<p>Refers to unequal or differential treatment based on one (1) or more protected grounds that results in a disadvantage. Discrimination may be intentional or unintentional, explicit, or subtle. Discrimination can be direct, constructive, or systemic in nature. It includes the failure to accommodate a person's needs arising from their protected ground, up to the point of undue hardship.</p> <p>Direct discrimination means unequal treatment and adverse treatment of an individual based on a prohibited ground(s). It often arises from negative attitudes, biases, and stereotypes toward groups identified by their protected grounds.</p> <p>Constructive discrimination (also known as Adverse Effect Discrimination) means a rule, requirement, policy, or practice that appears to treat everyone equally, but instead results in the disadvantage, restriction, or exclusion of a group identified by their protected ground(s).</p> <p>Systemic discrimination means patterns of behaviour, policies, or practices that are part of an organization's structures and create or perpetuate barriers or disadvantages for a group of people who share protected ground(s).</p>
Duty to Accommodate	<p>The duty to make every reasonable effort, short of undue hardship, to meet the needs of persons arising from a disability, family status, creed, gender identity, gender expression, sex, or another protected ground. These efforts aim for integration and must respect individual dignity, worth, privacy, autonomy, and individuality. Failure to meet this duty constitutes discrimination.</p> <p>The procedural duty to accommodate is the requirement for the accommodation provider to consider and investigate the accommodation request in good faith and in a thorough and timely manner. This should include meaningful interactions between the accommodation provider and the accommodation seeker, including the accommodation seeker providing relevant information to support the request, and the accommodation provider maintaining privacy and confidentiality, to the extent possible.</p>

Term	Definition
	<p>The substantive duty to accommodate is the requirement to determine and provide the most appropriate accommodation in the circumstances to meet the needs of the accommodation seeker, up to the point of undue hardship. This will not necessarily be the preferred or “perfect” accommodation.</p>
<p>Freedom of Expression</p>	<p>The right to speak, write, listen, challenge, and learn must be protected, as it is essential to discovery, critical assessment, and the effective dissemination of knowledge and ideas, and leads to social and economic advancement, as recognized by George Brown’s Freedom of Expression Policy.</p> <p>Expression that violates the law, including the <i>Code</i>, is not permitted. Expression that constitutes harassment, a threat, or hate speech is not permitted. Other context-specific boundaries to freedom of expression may also apply, such as those arising out of the terms of employment and collective agreements.</p>
<p>Harassment</p>	<p>Harassment refers to discriminatory harassment. Namely, a course of vexatious comment or conduct based on a protected ground, which exceeds the limits of freedom expression or academic freedom as these are protected under George Brown policies, where the person responsible for the comments or conduct knows or ought reasonably to know that they are unwelcome.</p> <p>Typically, harassment involves a series of multiple incidents; however, a single egregious incident may in some circumstances constitute harassment.</p> <p>Workplace harassment will be addressed under George Brown’s Codes of Conduct.</p>
<p>Hate</p>	<p>Refers to the extreme bias or hatred of persons or groups based on a particular protected ground. George Brown recognizes the historical and ongoing hate experienced by certain groups, including the Black, Indigenous, Jewish, and Muslim communities, trans people and 2SLGBTQIA+ communities, women, and other communities characterized by protected grounds.</p> <p>Hate is a form of discrimination. The Criminal Code of Canada criminalizes expression and conduct motivated by hate that targets an identifiable group.</p>

Term	Definition
Intersectionality	Occurs when individuals experience discrimination or harassment based on more than one (1) protected ground, such as race and creed.
OAREHRS	The Office of Anti-Racism, Equity, and Human Rights Services.
Poisoned (Negative) Environment	An objectively hostile or intolerable environment created by serious wrongful behaviour based on one (1) or more protected grounds that is sufficiently severe and/or pervasive. A complainant does not have to be a direct target to be adversely affected by a negative environment. It can also be found where harassment or discrimination is condoned or where people in authority respond ineffectively.
Protected Grounds	The grounds for discrimination that are prohibited by the <i>Code</i> : race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability, receipt of public assistance (housing only) and record of offences (employment only).
Racism	An ideology that either explicitly or implicitly asserts that one (1) racialized group is inherently superior to others. Racist ideology can be openly manifested in racial slurs, jokes or hate crimes. However, it can be more deeply rooted in attitudes, values, and stereotypical beliefs. In some cases, these beliefs are unconsciously maintained by individuals and have become deeply embedded in systems and institutions that have evolved.
Reprisal	Retaliation, or threatening or attempting to retaliate, against a person who is making a report or complaint under the HRDHP, cooperating or participating in a complaint resolution process, or pursuing any other rights under the HRDHP.
Respondent	A George Brown community member who is alleged to have breached the HRDHP.

Term	Definition
Responsible Administrator	<p>Responsible for decision-making following an investigation under the HRDHP. Also known as a decision-maker.</p> <p>Where the Respondent is a faculty member, instructor or teaching assistant, the Dean will normally be the Responsible Administrator.</p> <p>Where the Respondent is a staff member, the decision-maker will be one (1) level above the Respondent’s direct supervisor.</p> <p>For students who are Respondents, the Responsible Administrator is the Associate Vice-President, Student Success.</p>
Senior Administrator	<p>The President and the Vice-Presidents of divisions across George Brown.</p>
Sexual Violence	<p>An umbrella term that covers any sexual act or acts targeting a person's sex, sexual orientation, gender identity, or gender expression, whether the act is online, physical, or psychological in nature, which is committed, threatened, or attempted against a person without the person's consent.</p> <p>Sexual violence will be addressed under George Brown’s Sexual Harassment and Sexual Violence Policy and Procedures.</p>

4. Policy

4.1 Policy Breaches

- It is a breach of the HRDHP to engage in hate, discrimination, harassment or reprisal as defined in the HRDHP.
- It is also a breach of the HRDHP to breach confidentiality and interim measures assigned under the HRDHP.

4.2 Guiding Principles and Key Concepts

4.2.1 Equity, Diversity, Inclusion and Belonging

- Every George Brown community member has a role in creating a learning, working, and living environment free of hate, discrimination, and harassment.
- Addressing hate, discrimination, and harassment requires ongoing, sustained efforts at a systemic level with the acknowledgment that behaviours rooted in, or influenced by, conscious and/or unconscious bias, hate, prejudice, or negative

stereotypes that often underlie hate, harassment, and discriminatory conduct.

- George Brown will address power imbalances and intersectionality and is committed to mitigating and limiting their effects by decolonizing the complaint resolution processes and dismantling internal biases, structural oppression, and inequities.
- George Brown acknowledges that even when alleged conduct may not meet the formal definitions of harassment or discrimination under its policies, it can still profoundly affect an individual's ability to participate in George Brown's learning, working, and living environments.
- Complaints based on *Code*-protected grounds that compete with each other (often referred to as "competing rights") should be resolved in a manner that respects the rights of all parties.
- The complaints resolution process is equity-informed; this does not mean treating parties identically. It includes considering a person's social location to address power imbalances that create barriers or disadvantages to their participation.

4.2.2 Procedural Fairness

- Procedural fairness is the foundation of the complaint resolution process. George Brown is committed to ensuring that the complaint resolution processes for addressing allegations of harassment and discrimination is procedurally fair. Procedural fairness is context-specific.

4.2.3 Trauma and Violence-Informed Practices

- George Brown is committed to trauma- and violence-informed practices for addressing complaints of discrimination and harassment.
- Trauma- and violence-informed practices are implemented to prevent re-traumatization and enhance the effectiveness of interactions with the people involved in the complaint resolution process.
- George Brown recognizes that the Complainant, the Respondent, and witnesses may have experienced trauma and violence in their lives, which may be triggered during a complaint resolution process.
- Being trauma and violence-informed includes understanding how trauma affects people and their response and behaviours to services and in investigations. Being trauma and violence-informed also includes ongoing communication with the parties and transparency.
- All people involved in the complaint resolution process, including staff in the OAREHRS and other offices assisting with discrimination and harassment complaints, investigators, and Responsible Administrators, will be trained in trauma and violence-informed practices. If the OAREHRS initiates an investigation,

it will appoint an investigator competent to conduct trauma- and violence-informed investigations.

- Complainants, Respondents, and witnesses may invite a support person to attend any meeting at any step of the complaint resolution process with the OAREHRS, the investigator, or the Responsible Administrator. A support person provides support and does not answer on behalf of the person.
- The OAREHRS will maintain regular communication with the Complainant and Respondent throughout the complaint resolution process.

4.2.4 Timeliness

- The OAREHRS will attempt to complete the complaint resolution process in a timely manner, while always centring procedural fairness and a trauma and violence-informed approach.
- Generally, complaints will be resolved within twelve (12) months of the date the complaint was received, unless there are extenuating circumstances. The parties to a complaint will be notified if it is believed that the complaint will take longer than twelve (12) months to resolve.

4.2.5 Academic Freedom

- Academic freedom and freedom of expression are integral to George Brown. George Brown must be a place for open discussion and free inquiry where diverse voices can be heard, and ideas and viewpoints can be explored, debated, and discussed freely and openly without fear of reprisal, even if these are considered controversial or conflict with the views of some members of the George Brown community. Protections and limits for academic freedom may be found in Academic Codes of Conduct, collective agreements, and other college policies.

4.3 Addressing Potential Breaches of the HRDHP

- George Brown may vary procedural steps where necessary to ensure fairness, safety, accessibility, or compliance with legal obligations, provided such variation remains consistent with principles of procedural fairness.
- Before initiating a formal complaint resolution process, the OAREHRS may, where appropriate, take proportionate early intervention action to address concerns informally.
- In determining the appropriate response to a complaint or report, the OAREHRS will assess whether a matter falls within the HRDHP's application and scope.
- Where early intervention is not appropriate or does not resolve the concern, a formal complaint resolution process may be initiated. A formal complaint resolution process has two (2) potential pathways:

- **Alternative Resolution:** Alternative forms of complaint resolution that do not involve investigation or decision-making. Examples of alternative resolutions include mediation, impact statement(s), impact letter(s), facilitated dialogue, education, and restorative justice.
- **Investigation and Decision-Making** is a formal complaint resolution pathway involving investigation of the allegations and a determination by the responsible administrator as to whether a breach of the HRDHP has occurred.

4.4 Interim Measures

- Following a preliminary assessment, the OAREHRS may implement interim measures, where reasonably necessary, to support the safety and well-being of individuals and to protect the integrity of the complaint resolution process.
- Interim measures are temporary, non-disciplinary, and implemented without prejudice to the outcome of the complaint resolution process.

4.5 Accountability Measures

- Accountability measures are determined by the Responsible Administrator and are assigned following a finding of discrimination or harassment and breach of the HRDHP.
- The HRDHP, sanctioned by George Brown, is an institutional regulation requiring compliance across George Brown. A breach of the HRDHP may result in accountability measures commensurate with the breach in accordance with relevant academic and administrative codes of conduct and collective bargaining agreements.

4.6 Confidentiality

- George Brown is committed to maintaining the confidentiality of reports and complaints. George Brown is also legally required to assess and respond appropriately to reports or complaints, as it has a legal duty to maintain a working, learning, and living environment free of discrimination and harassment. This means George Brown may be required to initiate a complaint, contact the police, or make further disclosures as required by law about the alleged incident of harassment or discrimination, even if the Complainant does not consent.

4.7 Special Programs

- George Brown may create special programs as outlined in the *Code*, with the purpose of creating opportunities for groups that have experienced historical disadvantage, marginalization, and discrimination. In order to be a special program, the program must fulfill at least one (1) of the following conditions:
 - Relieve hardship or economic disadvantage.
 - Help disadvantaged people or groups achieve, or try to achieve, equal opportunity.
 - Help eliminate discrimination.

4.8 Freedom from Reprisal

- George Brown will take reasonable steps to protect Complainants, witnesses, and others from reprisal. This may include directing individuals in writing to refrain from engaging in or threatening retaliation and assigning accountability measures.

4.9 Frivolous Vexatious, Bad Faith Complaints or Abuse of Process

- Complaints that are frivolous, vexatious, or in bad faith, such as submitting a complaint knowing there has been no HRDHP violation, or conduct that is an abuse of process, such as causing undue delay, can harm the parties, the community, and the process.
- In most cases, a finding of a vexatious complaint or an abuse of process will be made with caution and will not discourage individuals from raising concerns in good faith. However, a finding may be referred to the respective Code of Conduct.

5. Prevention Through Education

George Brown is committed to preventing discrimination and harassment through education. The OAREHRS will develop an anti-racism, anti-oppression, and human rights education strategy, including initiatives, programs, and events, and ensure that education and prevention activities are accessible to all George Brown community members. The topics may include, but are not limited to:

- Engaging the George Brown community with authentic learning opportunities.
- Challenging the George Brown community to deeply reflect on its systems, practices, policies, and procedures.
- Inspiring the George Brown community to create an equitable and inclusive learning, working, living, and organizational culture and climate that is free of racism and hate in all its forms
- Understanding human rights, freedom of expression, and addressing and preventing racism and hate.
- Understanding rights and responsibilities under George Brown's human rights related policies.
- Understanding the complaint resolution process, including how to access support, report, or make a complaint and file an appeal.
- Trauma and violence-informed responses to complaints and investigations.
- Bystander intervention.

In addition to the above, the OAREHRS will develop an education strategy for responsible administrators/decision-makers, which will include understanding procedural fairness, counteracting bias, and trauma and violence-informed practices.

The OAREHRS will review its education plans every five (5) years, coinciding with policy review timelines.

6. Roles and Responsibilities

Note: Any reference to a role in the HRDHP includes their designate.

6.1 All George Brown Community Members are expected to:

- Review and understand their responsibilities under the HRDHP.
- Participate in education and training related to the HRDHP, where required or appropriate.
- Foster a learning, working, and living environment that is free from harassment, discrimination, hate, and reprisal.
- Use the complaint resolution process in good faith and not misuse or abuse the HRDHP.
- Cooperate in complaint resolution processes by providing relevant information in a timely manner.

6.2 George Brown Polytechnic will:

- Take proactive steps to identify and address institutional practices, policies, systems, and structures that may contribute to discrimination, harassment, hate, or systemic inequity.
- Support education, training, and dialogue on human rights, anti-discrimination, anti-oppression, anti-racism, and related forms of hate and discrimination, including anti-Black racism, anti-Indigenous racism, antisemitism, Islamophobia, and gender-based discrimination.
- Implement measures to support early intervention, de-escalation, and timely response to concerns when appropriate.
- Respond to complaints of discrimination or harassment in a manner that is fair, timely, effective, and consistent with the HRDHP and Procedures.
- Meet its legal obligations, including obligations under the Occupational Health and Safety Act, the Ontario Human Rights Code, and other applicable legislation.
- Maintain confidentiality of information gathered through the complaint resolution process, subject to the limits set out in the HRDHP and applicable law.

6.3 The Office of Anti-Racism, Equity, and Human Rights Services

- The process owner of the HRDHP. The OAREHRS operates impartially and does not act as an advocate for any party.
- Receive and respond to concerns, reports and complaints under the HRDHP.

- Conduct preliminary assessments to determine whether matters fall within the application and scope of the HRDHP and recommend appropriate process pathways in accordance with the Procedures.
- Provide information and guidance to parties regarding their rights, responsibilities, and available complaint resolution options.
- Facilitate complaint resolution processes in accordance with the HRDHP and associated Procedures.
- Guide Responsible Administrators on the application of the HRDHP.
- Provide information to Senior Administrators, managers and supervisors on the rights and obligations under the HRDHP. Provide consultation regarding opportunities for early intervention.
- Provide awareness, education, and training related to human rights, anti-racism, equity, accessibility, and inclusion.
- Identify systemic issues and trends arising from complaints and institutional practices.

6.4 Senior Administrators, Managers, Supervisors

- Ensure employees are informed about and adhere to the HRDHP, and that they participate in training.
- Establish and communicate workplace expectations in accordance with the HRDHP.
- Identify and immediately address, within their scope of responsibility, discriminatory and harassing behaviour that is amenable to correction. In consultation with the OAREHRS, attempt to address potential breaches of the HRDHP through early intervention.
- Report any discriminatory or harassing behaviour to the OAREHRS without delay.
- Hold George Brown community members accountable for failing to meet their responsibilities under the HRDHP.

6.5 Responsible Administrators/Decision-Makers

- Educate themselves on the HRDHP and actively participate in any required education and/or training on its guiding principles and their role.
- Work in partnership with the OAREHRS to interpret and apply the HRDHP, and support the fair and timely resolution of complaints.
- Request and review information from the relevant department within George Brown as appropriate to support their decision making (i.e., Office of the Registrar, human resources, legal etc.).

- Make determinations based on the information and investigation report as to whether a breach of the HRDHP has occurred, based on a balance of probabilities. Where a breach is found, determine appropriate accountability measures in accordance with applicable George Brown policies and collective agreements.
- Ensure that decisions are made impartially and in accordance with principles outlined in the HRDHP. Provide written reasons for decisions in accordance with the Procedures.

6.6 Senior Human Resources Consultants

- Consult with the OAREHRS to determine whether a harassment allegation is more appropriately addressed under the HRDHP or another George Brown policy (e.g., if it relates to harassment based on prohibited grounds).
- Support the Responsible Administrator in dealing with the outcome of an investigation into allegations of harassment or discrimination where a respondent is an employee.
- Be familiar with the support and resources outlined in the HRDHP and offered by George Brown through benefits, programs, and the Employee Assistance Plan (EAP).
- Support the responsible administrator in implementing an informal resolution dealing with a harassment and discrimination incident involving a respondent employee.

6.7 Office of Student Conduct and Support

- Work collaboratively with the OAREHRS to assess the application and scope of concerns and complaints related to allegations of non-academic misconduct against students.
- Administer the implementation of certain accountability measures for students (i.e., behavioural expectation agreements).

6.8 Placement Organizations and Vendors

- Comply with the *Code*, the HRDHP, and related Procedures.
- Employ duly diligent oversight and supervision to protect George Brown community members from discrimination and harassment.
- Cooperate with any George Brown complaint resolution process undertaken under the HRDHP Procedures.

7. Record Keeping, Data Governance, and Annual Reporting

- Documents are kept in accordance with George Brown's Records Management Framework Policy and related George Brown policies.
- All records related to a complaint resolution process shall be kept confidential in the

OAREHRS, including decisions, appeal decisions, and informal resolutions.

- Personal data will only be used for its collection
- OAREHRS will prepare an annual report summarizing relevant activities and initiatives undertaken to address discrimination, harassment, and hate within the George Brown community. The report will include information about complaints received, complaint types, matters that do not proceed to investigation, matters resolved through early intervention or other informal processes, associated Code-protected grounds and relevant intersectional considerations, as well as outcomes, response and resolution timelines, investigation findings, and any law enforcement involvement, where applicable and appropriate.
- George Brown will provide its Board of Governors and the Ministry of Colleges and Universities with an annual report detailing the information identified above and publish it on George Brown's website without identifying personal information, information that would compromise personal privacy, or otherwise confidential information.
- Anonymous complaints are included in annual reports without identifying information; complaints that may identify individuals who come forward and wish to remain anonymous are excluded from reporting.

8. Policy Review

- The HRDHP will be reviewed by the OAREHRS at a minimum every five (5) years, and periodically in light of changes to legislation or policy, specific direction from senior management, or as deemed appropriate by the OAREHRS and/or an agreed recommendation from stakeholders.
- The HRDHP review will include a consultative process (as outlined in the George Brown community consultation protocol) with key stakeholders, including students, equity deserving communities and other communities identified by their protected grounds.

9. Internal Services and Information

- Faculty, staff, and students can access advice and information about harassment and discrimination from a variety of George Brown offices. The following are official offices of George Brown that have undertaken training and education about the HRDHP and its Procedures that are available to provide advice and information on behalf of George Brown:
 - The OAREHRS
 - Public Safety and Emergency Management
 - People and Culture
 - Office of Student Conduct and Support
 - Counselling and Student Well-being

- The above George Brown offices are resources available for information and support; they can assist a complainant in preparing a complaint, but those wishing to file a complaint should do so by directly contacting the OAREHRS at diversity@georgebrown.ca.

10. George Brown Related Policies and Resources

- Academic Employees Collective Agreement
- Accessibility Learning Policy
- AODA Accessibility Policy
- Code of Non-Academic Student Behaviour
- Employee Code of Conduct - Academic Staff
- Employee Code of Conduct - Administrative Staff
- Employee Code of Conduct - Support Staff
- Freedom of Expression
- Guidelines on Secure Handling of Confidential Information
- Part-Time Support Staff Collective Agreement
- Privacy Policy
- Sexual Harassment and Sexual Violence Policy
- Support Staff Collective Agreement
- Workplace Accommodation Policy
- Workplace Violence and Harassment Prevention Program
- Whistleblower Policy

11. Governing Laws and Regulations

The HRDHP is governed by and read in alignment with the following legislation, regulations, and Ministry directives:

- *Ontario Human Rights Code*, R.S.O. 1990, c. H.19;
- *Occupational Health and Safety Act*, R.S.O. 1990, c. O.1;
- *Ministry of Training, Colleges and Universities Act*, R.S.O. 1990, c. M.19; and
- All other relevant legislation, regulations, and policy directives issued by the Ministry of Colleges, Universities, Research Excellence, and Security ("MCURES"), including the September 2024 Anti-Racism / Anti-Hate Directive issued under the *Strengthening Accountability and Student Supports Act, 2024*.

Where any provision of the HRDHP is inconsistent with applicable legislation, the legislation prevails.

12. Related Materials

- **Ontario Human Rights Commission**
- **Racism and Racial Discrimination: Systemic Discrimination (Fact Sheet)**