

POLICY

Title: Anti-Violence and Harassment in the Workplace	
Policy No: 2026-01	Supersedes: 2019-05
Effective Date: January 22, 2026	Approved by Council Motion No. January 21, 2026 #C2026-01-21-13

Part 1 Purpose

- 1.1 The Town of Annapolis Royal is committed to a healthy, safe and supportive workplace that is free from violence and harassment for all employees. The Town will respond promptly to threats, acts of violence, harassment and acts of aggression by any employee, councillors, third parties.
- 1.2 Every employee at the Town understands their roles and rights and is responsible for keeping the workplace free from any violence and harassment. This includes verbal and physical intimidation, hostile language and actions, verbal and physical threats, bullying or violent behavior by employees, councillors or third parties against self, others or Town property.
- 1.3 An employee, councillor, or third parties that exhibit harassing, violent or threatening behavior may be subject to criminal prosecution and shall be subject to disciplinary action up to and including dismissal from employment, removal from committee, or sanction under Municipal and Provincial legislation or policy.
- 1.4 Any employee, councillor, or third parties may file a complaint under this policy. Complaints by members of the public will be addressed through the Code of Conduct for elected officials and through our Human Resource Procedures and Policy for employees.

Part 2 Authority

This policy is enacted pursuant to sub-section 48(3) of the Municipal Government Act, as amended, and in accordance with Part 27 of the Workplace Health and Safety Regulations (the “Regulations”) under section 82 the Occupational Health and Safety Act.

Part 3 Definitions

- 3.1 “CAO”** means the Chief Administrative Officer of the Town of Annapolis Royal.
- 3.2 Appointed Council HR Representatives** means individual councillors assigned the responsibility of dealing with HR issues relating to Council and CAO
- 3.3 “Third Parties”** Persons who are engaged in work activities at the town workplace who are not direct employees of the Town. They include but are not limited to, volunteers, citizen appointees, members of the public and contractors.
- 3.4 “Complaint”** means a formal (written or verbal) allegation against a party of a situation that is unsatisfactory or unacceptable.
- 3.5 “Complainant”** means the person who has made a report about another individual whom they believe violated this Policy.
- 3.6 “Councillor”** means a member of the Town Council.
- 3.7 “Workplace Harassment”** Part 27.1 of the Regulations defines workplace harassment as a single significant occurrence or a course of repeated occurrences of objectionable or unwelcome conduct, comment or action in the workplace, including bullying, that, whether intended or not, degrades, intimidates, or threatens, and includes all of the following, but does not include any action taken by an employer or supervisor relating to the management and direction of an employee or the workplace.
 - 3.7.1** Workplace harassment or bullying that is based on any personal

characteristic, including, but not limited to a characteristic referred to in clauses 5(1)(h) to (v) of the *Human Rights Act*: age; race; colour; religion; creed; sex (gender, including pregnancy); sexual orientation; physical disability or mental disability; an irrational fear of contracting an illness or disease; ethnic, national or aboriginal origin; family status; marital status; source of income; political belief, affiliation or activity; association with another individual or class of individuals having characteristics named above.

3.7.2 Inappropriate sexual conduct, including, but not limited to, sexual solicitation or advances, sexually suggestive remarks or gestures, circulating or sharing inappropriate images or unwanted physical contact.

3.8 “**Confidentiality**” Subject to any limits or disclosure requirements imposed by law or required by this Policy, all information, oral and written, gathered, received or compiled through the course of a complaint is to be treated as confidential by the Employer, the Respondent and Complainant, their representatives, and witnesses. Where an Employee is named in a Complaint, the Complaint and the results of any investigation will only form part of the Employee’s personnel file if the complaint is substantiated.

Information obtained in relation to a complaint of workplace harassment will also only be disclosed if necessary for the purposes of investigating the Complaint or necessary for the purposes of taking corrective action with respect to the Complaint.

3.9 “**Investigator**” means the person charged with conducting the investigation.

3.10 “**Town**” means the Town of Annapolis Royal.

3.11 “**Respondent**” means the person who is alleged to have violated this, Policy.

3.12 “**Workplace**”, for the purposes of this policy, is considered to be any place occupied by an employee, councillor, committee member, client or citizen where Town business is being conducted as part of their employment or function which includes, but is not limited to, Town offices and sites, Town owned vehicles, work-related social gatherings, on-line or

electronic media, work- related functions or other locations where an employee, councillor, or Third parties are engaged in activity associated with their employment or conducting Town business, and private homes, businesses or construction sites where employee is conducting town business;

3.13 “Violence in the workplace” may include, but is not limited to, the following list of prohibited behaviors directed at or by employees, Councilors, third parties, but does not include any action taken by the employer or supervisor relating to the management and direction of a worker or the workplace.

- 3.13.1** Direct threats or physical intimidation such as shaking a fist at someone, finger pointing, destroying property, or throwing objects.
- 3.13.2** Physically aggressive behaviours including: hitting; shoving; standing excessively close to someone in an aggressive manner; pushing; kicking; throwing an object at someone; physically restraining someone or any other form of physical or sexual assault.
- 3.13.3** Verbal or written threats to physically attack an employee, including through electronic media.
- 3.13.4** Intentionally causing damage to the property of another.
- 3.13.5** Implications or suggestion of violence.
- 3.13.6** Harassment or bullying.
- 3.13.7** Intimidation.
- 3.13.8** Unwelcome and/or disrespectful comments, gestures or contact.
- 3.13.9** Stalking.

- 3.13.10** Possession of weapons of any kind on Town property, including parking lots, other exterior premises or while engaged in activities for the Town in other locations.
- 3.13.11** Assault of any form as defined under Federal or Provincial statute.
- 3.13.12** Physical restraint, confinement.
- 3.13.13** Dangerous or threatening horseplay.
- 3.13.14** Loud, disruptive or angry behavior or language that is clearly not part of the typical work environment.
- 3.13.15** Blatant or intentional disregard for the safety or well-being of others.
- 3.13.16** Commission of a violent crime on municipal property.
- 3.13.17** Cyber bullying such as posting offensive or intimidating messages through social media or e-mail and using the Internet to harass, sexually or physically threaten, or maliciously embarrass or exploit someone, or sending inappropriate electronic communications (for example, sexually explicit emails);
- 3.13.18** Spreading malicious rumors or gossip about an individual or a group.
- 3.13.19** Swearing at someone or using inappropriate language toward them.
- 3.13.20** Sexual Violence -making unwanted sexual advances or remarks such as abusive or derogatory remarks or jokes about someone's gender, gender identity, gender expression, sex or sexual orientation, sexual touching, sexual invitations, or requests in return for a promise of a reward (such as a promotion), or displaying offensive posters, cartoons, or images of a sexual nature.
- 3.13.21** Workplace violence that is based on any personal characteristic, including, but not limited to, a characteristic referred to in the

Canada Human Rights Act or Nova Scotia Human Rights Act.

- 3.13.22** The misuse of authority or position to intimidate, threaten, coerce, or otherwise mistreat any employee;
- 3.13.23** Any other act that a reasonable person would perceive as constituting a threat of violence.
- 3.13.24** It is defined broadly enough to include acts that may be considered criminal.

Part 4 Policy

- 4.1** The town will ensure all supervisors, councillors and the CAO receive training on identifying and mitigating workplace risks, as well as on proper reporting and investigation procedures.
- 4.2** The Town will ensure all Employees receive comprehensive training on this policy and its related procedures. Training will be updated whenever the policy is revised, and all new employees will complete this training as part of the onboarding process
- 4.3** Any person experiencing or witnessing imminent danger of personal injury or violence involving weapons should call 911 immediately.
- 4.4** Any person who is the subject of a suspected violation of the Anti-Violence and Harassment in the Workplace Policy involving violence without weapons or personal injury, or is a witness to such suspected violation, should report the incident to their supervisor, or the CAO of the Town.
- 4.5** Employees are expected to report any threat or act of violence that they have witnessed, received, or been informed of, to their supervisor, or the CAO; supervisors shall provide written notice of such a report to the CAO.

- 4.6 In cases where the respondent or complainant is a councillor, reports shall be made directly to the CAO.
- 4.7 In cases where the respondent or complainant is the CAO, reports shall be made to the Human Resource Representatives, Council Appointed.
- 4.8 Employees or councillors who commit violent acts or threaten to commit violent acts may be subject to disciplinary action, criminal prosecution and/or civil prosecution as appropriate.
- 4.9 Any individual who makes a substantial threat exhibits threatening behavior or engages in violent acts on the Town property, at Town sponsored events, or other location/event shall be subject to removal from the premises as quickly as safety permits, pending the outcome of an investigation.
- 4.10 Acts of violence (as defined in this policy) that occur between employees, councillors' and Third Parties that do not take place in the workplace (as defined by this policy) are still subject to this policy if:
 - 4.10.1 The behaviour is connected to the work relationship;
 - 4.10.2 The behaviour creates a hostile work environment;
 - or
 - 4.10.3 The behaviour involves intimidation, threats or stalking.

Part 5 Complaint

5.1 Complaint involving an employee or member of the public:

5.1.1 Anyone who believes that they have been the subject of harassment or violence in the workplace will:

5.1.1.1 Call 911 if the incident is an immediate threat to physical being or life.

5.1.1.2 If possible, make a reasonable attempt to resolve the behavior informally by telling the alleged offender that their behavior is unacceptable and unwelcome and clearly stating that this behavior must stop.

5.1.1.3 If the matter is not resolved informally between the individuals, the complainant should immediately inform one of the following: Their Supervisor, or the CAO.

5.1.1.4 Anyone who is a witness to harassment or violence in the workplace should immediately inform one of the following: their immediate supervisor, or the CAO. The witness will be notified if the complaint is resolved informally, or if the matter is progressing to an investigation.

5.1.2 Supervisors and managers who are aware of harassment or violence, including prohibited conduct or any potential for violence in the workplace are expected to address the situation promptly whether a formal complaint has been made.

Supervisors and managers are required to proactively address any conduct which could lead to violence or a violent act.

5.1.3 It is important that reports or complaints be made as soon as possible after the alleged incident has occurred so that the issue may be addressed as swiftly as possible.

5.1.4 The complainant may have evidence of harassing, violent or aggressive

behavior, but may not wish to lay a formal complaint, if this happens:

5.1.4.1 The CAO, or supervisor (in the case of employees) and the complainant may agree on an informal means of resolving the issue which may include informal meetings or other communications with the person against whom the allegations are made;

or

5.1.4.2 The CAO may recommend that an investigation should nevertheless occur as though a formal complaint was in fact laid, even where that recommendation is contrary to the wishes of the complainant. An investigation may need to proceed to see if the allegations are serious or if there have been previous complaints or incidents involving the respondent. The CAO will consider this recommendation in consultation with the Town Solicitor.

5.1.5 Where possible, a complaint must be made in writing and include details of.

5.1.5.1 What happened (description of the events or situation).

5.1.5.2 When it happened (dates and times of events or incidents).

5.1.5.3 Where it happened.

5.1.5.4 Who saw it happen (the names of any witnesses).

5.1.6 In all cases the CAO shall be immediately informed of reports and shall have the final decision on the appropriate course of action.

5.2 Complaint involving a councillor or the CAO who is either the complainant or respondent:

5.2.1 A councillor or the CAO who believes that they have been the subject of **harassment** in the workplace will:

5.2.1.1 Make a reasonable attempt to resolve the behavior informally by telling the alleged offender that their behavior is unacceptable and unwelcome and clearly stating that this behavior must stop.

5.2.1.2 If the matter is not resolved informally between the individuals, the complainant should immediately inform:

- a) the CAO if a councillor is the respondent or
- b) the Appointed HR Council Representatives if the respondent is the CAO.

5.2.2 A councillor or the CAO who believes that they have been the subject of **violence** in the workplace will:

5.2.2.1 Call 911 if the situation is an immediate threat to physical being.

5.2.2.2 If possible, remove themselves from the situation, then report immediately to;

- a) the CAO if a councillor is the respondent or
- b) the appointed HR Council Representatives if respondent is the CAO.

5.2.3 Anyone who is **witnessing** harassment or violence in the workplace involving a councillor or the CAO should immediately inform the

- a) CAO if councillor is involved
- b) HR Council Representatives if CAO is involved.

The services of a qualified external investigator may be engaged. The witness will be notified if the complaint is resolved informally, or if the matter is progressing to formal investigation.

- 5.2.4** The Council, CAO, supervisors and managers who are aware of harassment or violence including prohibited conduct or any potential for violence in the workplace are expected to address the situation promptly (not more than 48 hours) whether a formal complaint has been made.
- 5.2.5** It is important that reports or complaints be made as soon as possible after the alleged incident has occurred so that the issue may be addressed as swiftly as possible.
- 5.2.6** The complainant may have evidence of harassing, violent or aggressive behavior, but may not wish to lay a formal complaint. If this happens:
- 5.2.6.1** The investigator and the complainant may agree on an informal means of resolving the issue which may include informal meetings or other communications with the person against whom the allegations are made;
 - or
 - 5.2.6.2** The investigators may recommend that an investigation should nevertheless occur as though a formal complaint was in fact laid, even where that recommendation is contrary to the wishes of the complainant. An investigation may need to proceed into determination if the allegations are serious or if there have been previous complaints or incidents involving the respondent.
- 5.2.7** Where possible a complaint must be made in writing and include details of:
- 5.2.7.1** What happened (a description of the events or situation).
 - 5.2.7.2** When it happened (dates and times of the events or incidents).

5.2.7.3 Where it happened.

5.2.7.4 Who saw it happen (the names of any witnesses).

5.3 In all cases the CAO and Solicitor shall be immediately informed of reports (not more than 24 hours).

Part 6 Investigation

6.1 Investigations will be completed by the CAO, or other employees appointed by the CAO. In all cases involving a councillor or the CAO, the investigation shall be completed by a qualified external investigator.

6.1.1 The investigation will include:

6.1.1.1 Interviewing the complainant and respondent to ascertain all the facts and circumstances relevant to the complaint, including dates and locations.

6.1.1.2 Interviewing available witnesses, if any.

6.1.1.3 Reviewing any related documentation.

6.1.1.4 Making detailed notes of the investigation and maintaining them in a confidential file.

6.2 Where the case involves an employee, once the investigation is complete, the investigator will prepare a detailed report of the findings for the CAO. A summary of the findings will also be provided to the complainant and respondent.

6.3 Where the case involves a councillor, once the investigation is complete, the investigator will prepare a detailed report of the findings and recommendations and submit them to Council and the CAO at an in-camera session.

- 6.4** Where the case involves the CAO, once the investigation is complete, the investigator will prepare a detailed report of the findings and recommendations and submit them to Council at an in-camera session; if the CAO chooses, they may elect to have legal representation present for the delivery of the report to Council.
- 6.5** Should circumstances warrant, the respondent's employment, or seat on a committee may be suspended (with pay for employees and councillors) during all or part of the Town investigation. Where a criminal charge is laid, the Town reserves the right to suspend an employee, councillor or committee member without pay pending trial.
- 6.6** No employee, councillor or committee member shall be subjected to criticism, reprisal, retaliation or disciplinary action from The Town for good faith reporting pursuant to this policy; filing a complaint or providing evidence in bad faith could result in disciplinary action for employees, or suspension of committee seats for committee members and councillors.
- 6.7** This policy has the goal of balancing timeliness of the investigation with the concepts of thoroughness and fairness for all involved. Following are the investigation timelines:
- 6.7.1** Once a complaint is received, the investigator will have 14 calendar days to collect statements from victims and witnesses.
 - 6.7.2** The respondent will then have 14 calendar days to submit a rebuttal in writing.
 - 6.7.3** The investigator will then have 14 calendar days to submit a final report, including checking with complainants or witnesses on statements made by the respondent.
 - 6.7.4** Depending on the complexity of the situation, additional time may be allotted for proper research.

Part 7 Third Parties

- 7.1** Third parties including customers, clients and the public, are subject to this policy. The town will take reasonable action to stop or reduce the risk to its employees, councillors, or committee members of violations of the policy. Possible responses in violation of the policy may include:
 - 7.1.1** Posting this policy in a location visible to third parties.
 - 7.1.2** Removing access to Workplace for third party violators.
 - 7.1.3** Withdrawing Town services.
 - 7.1.4** Contacting law enforcement.
 - 7.1.5** Taking legal action against third party violators.

- 7.2** Where a third party engaged in harassment or workplace violence has been asked to stop and does not, employees are authorized to:
 - 7.2.1** Call 911 when there is an immediate threat to physical being or life.
 - 7.2.2** End telephone conversations.
 - 7.2.3** Decline service.
 - 7.2.4** Ask the individual to leave the workplace.
 - 7.2.5** Seek the assistance of a supervisor.

- 7.3** All such actions shall be reported immediately, in writing, to the supervisor, or the CAO.

- 7.4** Where employees are in the private home or business of a client who

engages in harassment or becomes violent, employees are authorized to leave the premise if safe to do so. If the situation becomes a threat to physical being or life, employees should call 911. Where a client has engaged in harassment or workplace violence in the past, or where there is a good possibility of the client becoming violent, employees are encouraged to meet in a public space with appropriate supports.

Part 8 Rights

- 8.1 Employees have the right to refuse work if harassment or workplace violence is likely to endanger them. In these instances, employees should immediately contact their supervisor, at which point appropriate measures will be taken to protect the employee and investigate the situation.

Part 9 Policy Review

- 9.1 This policy shall be reviewed every three years along with Appendix A

Part 10 Repeal and Replace

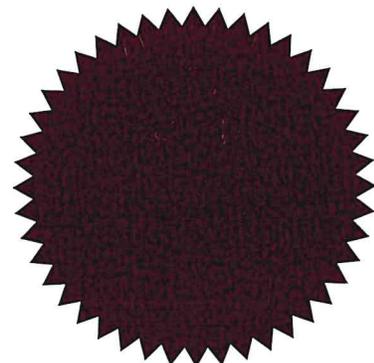
- 10.1 The policy known as Anti-Violence in the Workplace Policy #2019-05 adopted by Town Council on October 28, 2019, is hereby repealed.

THIS IS TO CERTIFY that this policy was duly passed by a majority vote of the whole Council at a duly called Council meeting held on 21st day of January 2026.

GIVEN under the hand of the CAO and under the seal of the Town of Annapolis Royal on the 22nd day of January, 2026.



Sandi Millett-Campbell
Chief Administrative Officer



Appendix A

Town of Annapolis Royal



January 22, 2026

WORKPLACE HARASSMENT AND VIOLENCE STATEMENT

The Town of Annapolis Royal is committed to providing a respectful workplace, free from Harassment and Violence.

Harassment and/or Violence are actions deemed by the employer to be unacceptable in the workplace. Incidents in which an employee exhibits offensive or violent behaviour to another employee, or group of employees, and where that individual knew, or ought reasonably to have known, the behaviour would cause offence or harm.

All employees are responsible for conducting themselves in a respectful manner that recognizes the rights and upholds the dignity of anyone they encounter in the performance of their duties.

Any form of harassment or acts of violence in the workplace will not be tolerated. Allegations of harassment must be reported to your supervisor or alternately the CAO.

For additional information refer to the Workplace Harassment and Violence Prevention Policy.



CAO Sandi Millett-Campbell



Date

