POLICY TITLE: Harassment Policy
POLICY NUMBER: AM.213
DATE APPROVED: 2014 07 02
CATEGORY: Administration (AM)
APPROVAL AUTHORITY: Lead (Administrative) Team
RESOLUTION / MINUTES REFERENCE NUMBER: 2014 07 02 LEAD Min; 2026 06 30 LEAD
POLICY HOLDER: President's Office

1. POLICY STATEMENT

The Columbia Bible College Administration, with the support of the entire CBC Community, will not tolerate any form of bullying or harassment. For the purposes of this document, we include bullying as a form of harassment. The College considers harassment a serious offence and will not tolerate harassing behaviour that may undermine the respect, dignity, self-esteem, or productivity of any student, faculty, staff, or administrative member.

The College is a Christian community that encourages its members to follow biblical principles of lifestyle and conduct in which all individuals are treated with respect and dignity, and are free from harassment. Upon joining CBC, faculty, staff, and administration alike agree to abide by the Responsibilities of Community Membership Statement, and students agree to abide by the Student Community Commitments. The Responsibilities of Community Membership Statement expresses some of the lifestyle and conduct expectations that contribute to our distinctiveness as a Christian academic community. Harassment is contrary to biblical standards and is a form of discrimination prohibited by law.

This Policy is not intended to constrain ordinary social or personal interaction between and among students, faculty, staff, and administration. This Policy has been adopted to expressly communicate that harassment will not be tolerated in the College community. All students, faculty, staff, and administration should understand the seriousness of any violation of this Policy. Violation of this Policy will not be tolerated and may lead to discipline.

2. POLICY

It is desirable, if possible, to resolve complaints of harassment internally and this policy is established to assist with such resolution.

The College encourages students, faculty, staff, and administration to bring concerns and complaints to the Harassment Policy Contact Officer (identified under Procedures) and in accordance with the procedures set out herein. Unless complaints are reported and resolved, it is very difficult for the College to maintain a harassment free community. All reports of harassment will be taken seriously and dealt with in accordance with the Harassment Policy Procedures.

An employee or student who believes he/she is being harassed should record all the details of the incident(s), including dates, times, location and possible witnesses. A record of incidents is not required to obtain assistance or to file a complaint. However, it may be useful in helping an employee/student remember details and could establish the basis of a harassment complaint.

Purpose

The purposes of this Policy are:

- to promote and maintain a Christian biblical community in which all students, faculty, staff, and administration are treated with respect and dignity and are free from harassment;
- to illustrate and clarify the types of behaviour that may be considered harassment;
- to outline the roles and responsibilities of the College, its administration, faculty, staff, and students in fostering a community free from harassment; and
- to establish guidelines for dealing with harassment complaints in an effective and timely manner, and a procedure for informal and formal review and resolution.

What is Harassment?

Harassment is a form of discrimination based on personal characteristics including, but not limited to, gender, race, political belief, sexual orientation and physical or mental disability. Discrimination, including the forms of harassment listed here (and others), is contrary to biblical standards and prohibited in British Columbia by the Human Rights Code (the "Code").

Harassment, within the provisions defined in this Policy, is a conduct or comment that ought reasonably to be known to be objectionable or unwelcome, serves no legitimate work or education related purpose, and which:

- detrimentally affects people within the work or educational environment; or
- has adverse job or education-related consequences, such as reduced job security or a negative impact on a student's or employee's advancement.

Harassment is further defined as, but not limited to, one or a series of incidents involving comments or actions based on an individual's characteristics or personal attributes as defined in Sections 8 and 13 of the Code (see definitions) as applicable to the College as described above, when:

- such conduct might reasonably be expected to cause insecurity, discomfort, offence or humiliation to another person or group;
- submission to such conduct is made either implicitly or explicitly a condition of employment or education;
- submission to or rejection of such conduct is used as a basis for any employment or education-based decision including, but not limited to, matters of promotion, raise in

salary, job security, grades, or benefits affecting the student, faculty, staff, or administrative member; or

- such conduct has the purpose or the effect of interfering with a person's work or educational performance or creating an intimidating, offensive, hostile or negative work environment.

In addition to the standard set out above, and in keeping with the College's obligations as an employer under the British Columbia *Workers Compensation Act* and WorkSafeBC Occupational Health and Safety (OHS) Policies (Item P2-21-2), workplace bullying and harassment of an employee includes any inappropriate conduct or comment by a person toward a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated. It does not include any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment. Where this Policy applies to employees in the course of their work, the procedures set out below also serve as the College's workplace bullying and harassment procedures for the purposes of WorkSafeBC.

Harassment can take place between individuals of the same or different status; it can involve individuals or groups. Both men and women can be the subject of harassment by either gender. Harassment may also include conduct and comments that are not directed specifically at an individual but which nonetheless create a degrading, offensive or negative work environment within an area or the College as a whole.

Physical and sexual assault, stalking or threats of violence directed towards a student, faculty, staff, or administrative member, his/her family and their possessions are criminal matters and should also be referred directly to the local police department.

Examples of behaviour or comments that might constitute bullying and harassment include:

- verbal aggression or insults
- calling someone derogatory names
- harmful hazing or initiation practices
- vandalizing personal belongings
- spreading malicious rumours

This definition of harassment is not meant to inhibit interactions or relationships based on mutual consent or normal social contact between students, faculty, staff, and administration. Senior administration should be consulted in regards to a consensual romantic relationship between two members of the college community, specifically when there is an inherently unequal position of the two participants. All students, faculty, staff, and administration must ensure that any relationships they enter into are consistent with the Responsibilities of Community Membership (See AM.227 Consensual Romantic/Dating Relationships for Columbia Employees). Students are guided by the Student Community Commitments regarding relationships with others.

Assessing whether conduct constitutes harassment

While this Policy's examples of harassment are not exhaustive, it has attempted to be definitive in the types of actions and behaviour that will not be permitted in the College's community. In assessing whether conduct constitutes harassment, the College will adopt the legal standard of the reasonable person; that is, "what would the reasonable person think?"

Behavioural requirements and questions posed by supervisors of students, staff, faculty, or administration that relate to the Responsibilities of Membership Statement, when posed in a respectful manner, do not constitute harassment. Given the religious and educational nature of CBC, section 41 of the Code is applicable. Section 41 states:

> *"If a charitable, philanthropic, educational, fraternal, religious or social organization or corporation that is not operated for profit has as a primary purpose the promotion of interests and welfare of an identifiable group or class of persons characterized by a physical or mental disability or by a common race, religion, age, sex, marital status, political belief, colour, ancestry, or place of origin, that organization or group must not be considered to be contravening this Code because it is granting a preference to members of the identifiable group or class of persons."*

The key principle at all times is to honour the upholding of a person's dignity within the parameters of the campus Christian community.

Harassment does NOT include actions occasioned through exercising in good faith the employer's managerial/supervisory rights and responsibilities, or the good faith academic decisions of the faculty/staff/administrative member. These actions must be done in a constructive and objective manner as to not constitute harassment.

Harassment may occur during one incident or over a series of incidents. Some action may not be considered harassment unless repeated.

The question is not whether the alleged harasser intended to offend, but rather, what would be the effect of his/her conduct on the reasonable person. This test will take into account the broad College community context. Overall, it must be also clearly understood that even though applicable legislation and case law may not determine the conduct about which the complaint is made to constitute harassment, this Policy may nevertheless apply.

Confidentiality

Every effort will be made to keep complaints confidential. However, ultimate responsibility for determining the resolution of a complaint lies with the College, and where there is any risk to other students, faculty, staff, or administration, disclosure will be made to the extent necessary to remedy the situation. Furthermore, disclosure may be made to appropriate authorities where required by law or where necessary to complete the process contemplated in the procedures set out herein.

The College shall not disclose to outside parties the name of the Complainant or an Informant, the circumstances giving rise to the complaint, or the name of the Respondent, except where required by law, where necessary to treat the Respondent with procedural fairness or for the purposes of investigating the complaint or taking disciplinary measures in relation thereto.

A breach of confidentiality will be considered a breach of this Policy and will be subject to disciplinary action. Such a breach may be considered to be a form of harassment or a form of retaliatory conduct or malicious complaint and would be dealt with as set out under 'Retaliation' and 'Malicious Complaints' below.

Procedures

These procedures outline several steps that are available to the College employees and students who feel that they have been harassed by others in or associated with the College community. These procedures describe how the College will respond to specific complaints. These procedures are in addition to and not in substitution for other remedies, including those existing under the Code and the Criminal Code of Canada.

By expecting accountability and truthfulness, it is hoped that there will be an atmosphere that will promote redemption, healing, repentance, forgiveness and reconciliation. However, it must be acknowledged that the outcome may or may not satisfy the aggrieved and/or the respondent. It is the administration's responsibility to ensure the safety of the aggrieved, a fair investigative process and appropriate outcomes.

First Step

A Complainant or Informant should discuss their concern with the Harassment Policy Contact Officer (stated below) without giving the name of the potential Respondent. The anonymity of both the Complainant and the Respondent will be respected until the Complainant or the College chooses a resolution process that requires identification. The College retains the right to initiate and conclude investigations it deems necessary.

The College has the following Harassment Policy Contact Officers (each is an "Officer"):

1. For complaints initiated by or directed toward students:
    a. Dean of Students
2. For complaints involving staff and faculty only:
    b. Manager of People and Culture

Individuals wanting to talk about a particular situation or make a complaint may approach the appropriate Officer. The Officer will maintain the confidentiality of all information received in accordance with this Policy. Information relating to a complaint or investigation will only be shared with those who require the information to administer this Policy, make decisions arising from the complaint, obtain professional advice, or as otherwise required by law. Where appropriate, the Officer may seek confidential guidance or assistance from qualified internal or

external advisors, including legal counsel, human resources professionals, investigators, or designated organizational decision-makers. Any such disclosure will be limited to the information reasonably necessary for the purpose.

The Complainant will also be advised that: (a) he or she can be represented by a person of his or her choice at any stage of the process when the Complainant is required or entitled to be present; and (b) he or she can withdraw the Complaint at any stage, although the College may decide to pursue further action if deemed appropriate.

If the situation or complaint involves a person identified as an Officer, above, individuals should bring their situation or complaint directly to the President of the College. If the President is also involved, the individual should then approach the Chair of the Board of Directors.

Second Step: Informal Resolution

A person who considers that she or he has been subjected to harassment is encouraged to bring the matter to the attention of the person responsible for the conduct, tell him/her that his/her behaviour is not appropriate and request that it stop. Although this is difficult, in many situations it is the most effective method of eliminating the problem.

A direct approach to the person whose conduct has caused offence is suggested. Frequently, people are unaware that their conduct is offensive and all that is needed to prevent its repetition is a simple statement that the conduct is unwelcome. Such notice is not a prerequisite to a complaint as power and status disparities between the Respondent and the person who has been subjected to workplace harassment may make it impossible or unreasonable for the latter to confront the Respondent.

The recommended policy does not stipulate any time limits for the reporting of a complaint. It should be drawn to the attention of all members and employees as part of the educative process that the longer they wait to report an incident, the greater the chance that:

- witnesses will be unavailable;
- witnesses will not remember the events; and/or
- the Respondent will be able to make a case that the delay has prejudiced the ability to put forward a proper defense.

If the Complainant is not comfortable taking that initiative, he/she may approach the appropriate Harassment Officer or the Manager of People and Culture for assistance. The assistance may involve advice on how to resolve the matter informally, or it may involve a mediated conversation between the Complainant and Respondent with the help of the appropriate Officer or designate.

If the matter is resolved and the relationship is restored in this informal stage, no written records will be kept and the resolution process is complete.

If the Officer and the Complainant agree that the conduct in question does not contravene the Harassment Policy, the Officer will take no further action.

If the Complainant does not wish to proceed with a written complaint, the following steps may still be taken:

- the Complainant may request the Officer to meet with the Respondent with a view to obtaining an apology and/or an assurance that the offensive conduct will not be repeated or continued;
- where the Complainant does not wish the Officer to take further action, the Officer may still meet with the Respondent and represent the Complainant provided that the Officer is satisfied that such can be done without disclosing, directly or indirectly, the identity of the Complainant; or
- where the Complainant does not wish the Officer to take further action, the Officer may still make a written complaint if there have been previous complaints against the Respondent or if the Respondent has previously given an assurance that such conduct will not be repeated or continued.

Third Step: Formal Resolution

The Complainant may decide to file a formal complaint if:

- he/she chooses not to meet with the Respondent informally;
- he/she met with the Respondent and no agreement for resolution of the complaint was reached;
- an agreement for resolution was breached by the Respondent.

The complaint will specify the details of the allegation including:

- names of the Complainant (and/or Informant) and Respondent;
- a detailed description of the alleged harassment (dates, times, locations, witnesses, if any); and
- the specific remedy sought by the Complainant.

Fourth Step: Process Following Receipt of Written Complaint

If the Complainant consents, the Officer may seek a meeting with the Respondent to obtain an apology or such other resolution as will satisfy the Complainant.

If such a meeting is not held, or if such a meeting fails to resolve the complaint, the Officer will, with the assistance of the Lead Team (excluding any member of the Lead Team that may be involved in the complaint) provide the Respondent with a copy of the complaint and begin an investigation. The Respondent will, in normal circumstances, be given five (5) days in which to respond to the complaint, in writing, or more as the Lead Team determines based on the specifics of the allegations. The Respondent will also be given a copy of the Harassment Policy

and advised that he or she has the right to be represented by a person of his/her choice at any stage of the process when the Respondent is required or entitled to be present.

The investigation will be completed within thirty (30) working days or at a later date mutually agreed to by both parties and submit a report in writing to the Officer and Lead Team.

The Officer will take appropriate action and inform both parties in writing of the finding and the resolution.

What the Investigation Will Include

An investigation under this Policy will be undertaken promptly and diligently, will be fair and impartial to both the Complainant and the Respondent, and will be focused on finding facts and evidence. As appropriate to the circumstances, an investigation will include:

- separate interviews with the Complainant, the Respondent, and any witnesses;
- a review of any relevant evidence, such as emails, written records, photographs, or physical evidence; and
- consideration of any need or request from the Complainant or Respondent for assistance or support during the process.

Where the Complainant and the Respondent agree on what occurred, the College may proceed directly to determining what corrective action to take, if any, without investigating further.

While most investigations will be conducted internally, the College may engage an external investigator in complex, sensitive, or higher-risk situations, or where an impartial internal investigation is not possible (for example, where a member of senior administration is the Respondent). Whether internal or external, the investigator will provide a written report with conclusions to the Lead Team and the Officer.

Fifth Step: Results of Investigation, Disciplinary and Rehabilitative Actions

Should a formal investigation reveal evidence to support the complaint of harassment, the Respondent will be disciplined appropriately considering such factors as the severity of the harassment, whether such was intentional or unintentional, whether the incident was an isolated one, and any mitigating circumstances.

Students, faculty, staff, and administration violating this Policy may be subject to a range of disciplinary sanctions. This may include one or more of the following, but is not limited to: a letter of apology, a letter of reprimand, revocation of privileges, counselling, a change of work or study assignment of the Respondent, the suspension or termination/expulsion of the Respondent. Spurious or false complaints are dealt with according to the same actions.

In addition to the sanctions that may be imposed by the College, employees of the College who engage in harassment may expose themselves personally to damages in the event of a successful lawsuit or human rights hearing.

Follow-up and Support Following an Investigation

Consistent with this Policy's commitment to the safety, healing, restoration, and dignity of every member of the community, the College will support workers who may experience psychological harm or other adverse effects arising from workplace bullying or harassment. Employees who are eligible for the College's group health benefits may be referred to the College's Employee Assistance Program (EAP) and may access counselling or related supports available under the College's extended health benefits. Workers who are not eligible for these benefits will be encouraged to seek appropriate medical advice or counselling and may be directed to available community resources.

Following an investigation, the Manager of People and Culture, in consultation with the Lead Team, will review and, where necessary, revise workplace practices and procedures to prevent the recurrence of bullying or harassment. Appropriate corrective actions will be identified and implemented within a reasonable time frame.

Sixth Step: Appeals

All appeals must be commenced within thirty (30) days from the date the person wishing to appeal is advised of the investigator's findings.

All appeals must be made in writing and addressed to the Harassment Contact Officer. If the Officer is the person against whom the complaint is being made, then the appealing party will address the appeal to the President of the College. If the President is the person against whom the complaint is being made, then the appealing party will address the appeal to the Chair of the Board of Directors.

Normally all appeals will be heard by a committee of the College established by the Lead Team, whose procedures will be determined by that committee. Its decision will be final and binding on all parties, including the College, the Complainant and the Respondent.

If, for some reason, the Lead Team of the College deems this process to be unsuitable, the Lead Team may arrange for another process and the parties will be required to abide by it.

Record Keeping

For the protection of all parties, all formal complaint records and documentation will be maintained by People & Culture in the strictest confidence, except to the extent necessary to implement an investigation or resolution. If there is a finding of harassment, the outcome of the investigation and any disciplinary action will be recorded permanently in the personnel or student file of the Respondent. All other formal records will be retained for ten years after the creation of the record.

The College's Lead Team will be advised about any formal complaints made against or by its faculty and staff and will be kept apprised of all proceedings. Decisions about employment sanctions will be made by the Lead Team.

Annual Review of Policy and Procedures

This Policy and its procedures will be reviewed at least once annually. As part of each annual review, the College will consider any incidents of bullying or harassment that arose during the preceding year and will revise this Policy and its procedures as necessary. Responsibility for coordinating the annual review rests with the Manager of People and Culture in consultation with the Lead Team. The date of each review will be recorded below.

Date created: 2014 07 02

Last reviewed: 2026 06 29

Next review due: 2027 06 01

Responsibilities

An employee or student who believes that the actions or words of another employee or student constitute harassment has a responsibility to report as soon as possible to one of the Officers. In the event of a harassment complaint, employees and students are expected to respect the confidentiality of the process and cooperate in achieving resolution.

The College administration is responsible for:

- setting a clear example of appropriate workplace behaviour;
- being generally aware of workplace behaviour;
- being knowledgeable of organizational procedures for reporting and investigating complaints of harassment;
- taking prompt action once a complaint of harassment has been brought forward;
- informing employees and students about the Harassment Policy and these procedures, including their roles and responsibilities; and
- complying with the provisions of the Policy and these procedures.

The Officer or any investigators have the responsibility to conduct the formal investigation in a fair and timely manner respecting the confidentiality of the process. Once the investigation is complete, the Officer must submit a written report to the Lead Team.

All conflicts of interest must be reported immediately to the College's Lead Team.

Retaliation

Retaliation will not be tolerated. For the purposes of this Policy, retaliation will be treated as harassment and will be dealt with in accordance with this Policy when it is experienced and reported by any given individual who has:

- invoked this Policy (whether on behalf of one's self or another individual); or
- participated in or cooperated in any investigation under this Policy; or

- been associated with a person who has invoked this Policy or has participated in its procedures.

Retaliation includes actions or comments that trivialize the complaint or the Complainant and includes any action taken against the Complainant for having invoked this Policy or against anyone else that participates or cooperates in an investigation of a complaint. It also includes criticisms of the Complainant, the Respondent, or Informant.

To be more specific, retaliation includes, but is not limited to:

- the Respondent/Complainant confronting the Complainant/Respondent or an Informant inappropriately about the complaint;
- the Respondent/Complainant initiating conversations about the Complainant/Respondent, an Informant, or the complaint with other students, faculty, staff, and administration in a negative way; or
- in a case where the Respondent/Complainant is in a position of power over the Complainant/Respondent or an Informant, the Respondent/Complainant making educational or employment decisions that could reasonably be seen to be retaliatory or accusing the Complainant/Respondent or an Informant of being disloyal.

Malicious Complaints

Malicious or vexatious complaints will not be tolerated. Where, as a result of investigation, it is determined that a Complainant or Informant has made a complaint in bad faith (including any purpose outside of a bona fide desire to redress or prevent harassment) or with the intent to harm another, the College may discipline that Complainant or Informant. This may include, but is not limited to, a letter of reprimand, revocation of privileges, suspension, expulsion or termination of employment for cause.

3. DEFINITIONS

Code – entire Human Rights Code (sections 8, 13, and 41 selected)

Section 8

Discrimination in accommodation, service and facility:

A person must not, without a bona fide and reasonable justification,

- deny to a person or class of persons any accommodation, service or facility customarily available to the public, or
- discriminate against a person or class of persons regarding any accommodation, service or facility customarily available to the public

because of the race, colour, ancestry, place of origin, religion, marital status, family status, physical or mental disability, sex or sexual orientation of that person or class of persons.

Section 13

Discrimination in employment:

A person must not

- refuse to employ or refuse to continue to employ a person, or
- discriminate against a person regarding employment or any term or condition of employment because of the race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation or age of that person or because that person has been convicted of a criminal or summary conviction offence that is unrelated to the employment or to the intended employment of that person.

Complainant - refers to the individual who has filed a complaint alleging harassment/discrimination; or unethical, immoral, or unprofessional behaviour; or being a recipient of an alleged unfair supervisory decision.

Respondent - refers to the individual (or group of individuals) who is alleged to have harassed or discriminated against the Complainant, acted in an unethical, immoral, or unprofessional manner; or made a supervisory decision alleged to be unfair. A respondent is not necessarily a person in a superior position, a member of the opposite sex or aware that his/her behaviour is considered unwelcome.

Informant – is anyone providing information with respect to the complaint.

4. APPLICABILITY

Individuals the policy applies to

This Policy applies to all students, faculty, staff, and administration attending or working for the College, regardless of seniority or position.

It also applies to all individuals with whom the College conducts business, either internally or externally. The College recognizes that its students, faculty, staff, and administration may be subject to harassment by those with whom the College conducts business. In these circumstances, the College acknowledges its responsibility to support and assist any person subjected to such inappropriate behaviour. Members of the College community should be aware that the College has limited ability to seek redress against external individuals, other than to discontinue our relationship with them, if permitted by the applicable contract(s).

Where the policy applies

The Policy is not restricted to the College campus and educational activities. It applies where there is a sufficient relationship between the conduct or comment about which

complaint is made, and the functioning of the College as an institution. It applies to all activities and events related to or in association with the College at:

- any location where classes or business activities are being carried out (e.g., offices, classrooms, grounds, cafeterias, meeting rooms and parking lots);
- other locations and situations (e.g., the College related travel, seminars, field trips, conferences, employee parties, after hour get-togethers, etc.) where the prohibited behaviour has or may be reasonably viewed as resulting solely or primarily from the College related responsibilities or relationships or having a subsequent impact on the educational/work relationships, environment, or performance.

The Policy does NOT apply to non-College-related interactions or events such as chance encounters between employees in a social, church or community setting. Nor would it apply to activities planned by social, church, or community groups in which the College employees are involved separate from their employment or student responsibilities or involvements.

5. RELATED POLICIES/REFERENCES

This policy is maintained with the College's administrative policies in the shared policy folder on Microsoft Teams, which is accessible to all employees, and will be incorporated into the College's HR / Employee Manual when that manual is developed.

- Responsibilities of Community Membership Statement
- BCMB Confession of Faith
- MCBC Confession of Faith
- Guidelines for Students in the Administration of the Discrimination and Harassment Policy
- WorkSafeBC OHS Policy Item P2-21-2 – Employer Duties, Workplace Bullying and Harassment

6. APPENDIX

AM.227 Consensual Romantic/Dating Relationships for Columbia Employees