



**POLICY TO PREVENT AND MANAGE SITUATIONS
OF PSYCHOLOGICAL HARASSMENT
(updated: January 8, 2026)**

1) OBJECTIVES

The objectives of this policy are to:

- affirm the commitment of Church Society of the Diocese of Quebec to prevent and put an end to any situation of psychological or sexual harassment related to work, including harassment from external sources;
- indicate the means put in place to prevent harassment, including the information and training programs offered;
- establish the procedure for managing with complaints and problematic situations that are brought to the attention of the employer, or its designated representative, by way of a report.

2) SCOPE

This policy applies to all employees of Church Society of the Diocese of Quebec at all levels of the hierarchy, including in the following locations and settings:

- workplaces, including telework locations, if applicable;
- any other place where people are likely to be in the course of their employment (e.g., common areas on the employer's premises, during meetings, training, travel);
- during work-related social activities.

This policy also applies to communications transmitted or received by any means, technological or otherwise, in a work context (e.g., social media, emails, text messages, postings, letters).

3) DEFINITION

The *Act respecting Labour Standards* defines psychological harassment as follows¹:

"Any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that results in a harmful work environment for the employee. For greater certainty, psychological harassment includes such behaviour in the form of such verbal comments, actions or gestures of a sexual nature.

A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment."

This definition includes discriminatory harassment related to one of the grounds set out in the *Charter of Human Rights and Freedoms*².

4) POLICY STATEMENT

(a) Management's Rule

Church Society of the Diocese of Quebec does not tolerate or condone any form of harassment in a work context, including:

- by managers towards employees;
- between colleagues;
- by employees towards their superiors;

¹ See Schedule 1 of this policy for more details.

² These grounds of discrimination are listed in Schedule 1.



- from any person associated with it: representative, customer, user, supplier, visitor or other.

Any person who commits a breach of this policy will be subject to appropriate disciplinary measures. The choice of the applicable measure will take into account the seriousness and consequences of the act(s) as well as the former file of the person who committed them.

A person who makes false accusations with the intent to cause harm is also subject to appropriate disciplinary measures.

b) Personnel's Responsibilities

It is the responsibility of all employees to adopt behaviour that promotes the maintenance of a work environment free of psychological or sexual harassment. In this regard, the expectations of all members of the personnel are as follows:

- contribute to a harassment-free workplace;
- respect people in the course of their work;
- participate in the mechanisms put in place by the employer to prevent and stop harassment;
- report any harassment-related situation as soon as possible to one of the persons designated by the employer to receive and handle complaints and reports.

(c) Prevention of psychological or sexual harassment

Church Society of the Diocese of Quebec undertakes to take reasonable measures to provide a workplace free of all forms of harassment in order to protect the dignity as well as psychological and physical integrity of individuals.

In accordance with its legal obligations, the employer implements measures to identify, control and eliminate the risks of psychological or sexual harassment, in particular by:

- a) disseminating this policy in a manner that makes it accessible to all of its personnel, through:
 - posting up-to-date policy on its website
 - distribution to Church Society employees, clergy, Diocesan Council members, Central Board members, Church Corporations, lay readers, Office holders, holders of Bishop's licenses
 - written reference in the Bishop's annual letter.
- b) maintaining ongoing monitoring of risks and risk factors likely to generate harassment situations, including the situations mentioned in Schedule 1 of this policy;
- c) ensuring that the policy is understood and complied with by all persons;
- d) promoting respect among individuals;
- e) regularly sensitizing the personnel on the roles and responsibilities of each employee in preventing harassment, including at work-related social activities;
- f) establishing a training and awareness program for staff and designated persons to receive and handle complaints and reports, including:
 - access to a series of webinars and recorded webinars
 - creation of a flow chart to help guide people in dealing with complaints and reports
 - encourage ongoing collaboration with other appropriate bodies in regards to training and policy implementation
 - professional development sessions for staff, clergy, and designated persons
 - use of and reference to the Quebec Diocesan Employee Assistance Program
- g) consulting the personnel on situations specific to their workplace that may create conditions that could lead to harassment;
- h) holding meetings with people who are leaving their jobs to find out the reasons for their departure;
- i) by having a diligent process for dealing with complaints and reports.

Church Society of the Diocese of Quebec undertakes to integrate this policy to prevent and manage situations of psychological or sexual harassment as well as all the measures resulting from it into the



prevention program or the action plan in terms of occupational health and safety, to review this policy at least once a year and to communicate the changes to the personnel.

(d) Handling of complaints and reports

Any member of the personnel who believes they are experiencing work-related harassment can file a complaint so that the employer can take the necessary actions to remedy the situation.

Any member of the personnel, including a person who witnesses behaviours or conduct that are similar to harassment or at risk of becoming harassment, may also make a report to bring the situation to the attention of the employer.

A report or complaint may be made verbally or in writing. The details of incidents must be described as accurately as possible to facilitate prompt and diligent management.

The law prohibits any form of prejudice or reprisals from the employer in the context of the processing and settlement of a complaint or report.

Church Society of the Diocese of Quebec commits to:

- handle the complaint or report as soon as possible;
- preserve the dignity and privacy of the individuals involved, including the person who made the complaint or the report, the person who is subject of the complaint or the report, and witnesses;
- ensure that all those involved are treated with humanity, fairly and objectively and that adequate support is provided to them;
- protect the confidentiality of the intervention process, including information related to the complaint or the report;
- offer the persons concerned the opportunity to hold, with their agreement and when the context is appropriate, a mediation meeting to resolve the situation, ensuring that this assistance takes place in a neutral and impartial context;
- conducting, if necessary, an investigation in a timely and objective, neutral and impartial manner or, if internal resources are not available or if they do not have the required qualifications to do so, to assign responsibility to an external consultant in order to preserve the impartiality of the intervention and ensure its quality. The persons concerned will be informed of the conclusion of this process. If the investigation does not establish that there has been unacceptable behaviour, all physical evidence will be retained for two years and destroyed thereafter;
- take all reasonable measures to resolve the situation, including appropriate disciplinary measures;
- review the harassment prevention measures in place to ensure that they remain effective, in order to prevent future similar events.

The persons designated by the employer to receive and handle complaints and reports are the following:

Mr. Stephen Kohner
Secretary of Synod
2473 rue le Caron
Baie-Comeau, QC. G5C 2G7
418-295-3431 (res)
418-378-0679 (cell)
skohner@quebec.anglican.ca

Mrs. Dale Keats
17 Whitely
St. Paul's River, QC
G0G 2P0
keats.dale@outlook.com



These persons are primarily responsible for:

- inform personnel of the employer's policy on psychological or sexual harassment;
- receiving complaints and reports;
- evaluate each request and recommend appropriate actions or interventions (e.g., one-on-one meetings, mediation, investigation), based on the context;
- determine who will be the competent person responsible for the response
- follow-ups to ensure that the persons concerned are adequately supported and that the intervention has achieved the desired effects.

Church Society of the Diocese of Quebec:

- will ensure that the persons designated to receive and handle complaints and reports are properly trained to carry out the responsibilities entrusted to them and that they have the necessary qualifications and tools at their disposal to process and follow up on the complaint or report, including the assessment of complaints alleging harassment, to recommend an administrative investigation;
- will release working time so that designated persons can carry out their assigned duties.

Edward Simonton
[Name of employer]

January 8, 2026
Date

Note: Following the procedure outlined in this policy does not prevent a worker from exercising recourse with the CNESST.



SCHEDULE 1 – RECOGNIZING PSYCHOLOGICAL OR SEXUAL HARASSMENT

The *Act respecting Labour Standards* provides five criteria for determining what can be considered psychological or sexual harassment, namely:

- vexatious behaviour (hurtful, humiliating);
- that manifests itself repeatedly or during a single and serious act;
- in a hostile (aggressive, threatening) or unwanted manner;
- violating the dignity or integrity of the person;
- resulting in a harmful (harmful, damaging) work environment for the latter.

Discrimination based on any of the grounds listed in Section 10 of the *Charter of Human Rights and Freedoms* (race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, handicap or the use of any means to palliate a handicap) may also constitute harassment.

This definition applies to all work contexts, including teleworking and when participating in work-related social activities.

For example, the following behaviours could be considered vexatious conduct constituting harassment if they satisfy all the criteria of the definition set out in the law.

Behaviours that may be related to psychological harassment

- Bullying and cyberbullying
- Threats, isolation
- Offensive or defamatory comments or actions about a person or their work
- Verbal abuse
- Denigration

Behaviours that may be related to sexual harassment

- Any form of unwanted attention or advance of a sexual nature, for example:
 - insistent solicitation
 - looks, physical contacts
 - sexist insults, rude language
 - sexual comments, jokes or images

The concept of harassment must be distinguished from other situations such as interpersonal conflict, work-related stress, difficult professional constraints or the normal exercise of management rights (management of attendance at work, work organization, disciplinary measures, etc.).

The employer has an obligation to intervene when a problematic situation related to harassment, or the risk of harassment, is brought to its attention. However, it is good practice, when possible, for a person who believes that he or she is being subjected to inappropriate behaviour in the workplace to notify the person concerned that his or her behaviour is undesirable before filing a complaint or report. The person should also note the date and details of the incidents and the actions he or she has taken to try to resolve the situation.

If no action is possible or if the conduct continues despite an initial approach, the situation should be brought to the attention of the persons designated by the employer to receive and handle complaints and reports so that an appropriate intervention can be made.

Preventing risks to psychological health: a shared responsibility

Section 51 of the *Act respecting Occupational Health and Safety* stipulates that the employer must take the necessary measures to protect the health and ensure the safety and physical and mental well-being of the worker. In particular, he must use methods and techniques intended for the identification, control and elimination of risks that may affect the health and safety of the worker, including harassment.



Section 49 of the same law lists the obligations of workers, including the obligation to take the necessary measures to ensure their health, safety or physical or mental well-being and to ensure that they do not endanger the health, safety or physical or mental well-being of other persons at or near the workplace.

For more information and links to the tools made available by the CNESST

- [Harassment in the workplace | Commission des normes, de l'équité, de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Preventing and responding to harassment | Commission des normes, de l'équité, de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#) (in French only)
- [Work-related psychosocial risks | Commission des normes, de l'équité, de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#) (in French only)

Training and Webinars

- [Webinar - Demystifying psychological or sexual harassment in the workplace](#) (available on a replay at all times) (in French only)
- [Online training on labour standards at your fingertips](#): module on psychological or sexual harassment and explanations of the steps in the process of filing a complaint with the CNESST (in French only)
- <https://worksitesafety.ca/product/training/online/violence-harassment-workers/>

Capsules and videos

- [Examples of situations of harassment in the workplace](#)
- [Mediation: a service that promotes rapid and harmonious resolution of a conflict](#) (in French only)
- [Psychological or sexual harassment in the workplace - Our expert informs you](#) (in French only)

Publications

- [Checklist – Harassment in the workplace | Commission des normes, de l'équité, de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#) (in French only)
- [Understanding and preventing psychological or sexual harassment in the workplace - Practical guide for employers](#) (in French only)
- [Psychological or sexual harassment, let's talk about it!](#) (in French only)
- <https://www.worksafebc.com/en/resources/health-safety/posters/bullying-and-harassment-poster-checklist> (British Columbia)



**SCHEDULE 2 – COMMITMENT OF PERSONS DESIGNATED BY THE EMPLOYER TO RECEIVE AND
HANDLE COMPLAINTS AND REPORTS RELATING TO WORK-RELATED PSYCHOLOGICAL
HARASSMENT**

Commitment

I hereby declare my commitment to comply with the policy to prevent and manage situations of psychological or sexual harassment of Church Society of the Diocese of Quebec. I guarantee that my recommendations and interventions will be impartial, respectful and confidential.

Stephen Kohner

Name of Designated Person No. 1

Signature of Designated Person No. 1

January 8, 2026

Date

Dale Keats

Name of Designated Person No. 2

Signature of Designated Person No. 2

January 8, 2026

Date