

Procedure

Title	Respectful Workplace and Bullying & Harassment Prevention		
Parent Policy	Respectful Workplace and Bullying & Harassment Prevention	Responsible Office	People and Culture
Classification	Administrative	Effective Date	March 24, 2026
Category	Human Resources & Employment	Document No.	1075 - PR
Approval	Executive Committee		

This procedure is applied in a manner consistent with applicable statutory and legal obligations, including university collective agreements, terms of employment and the parent policy.

The most up-to-date versions of the university's procedures are posted on the policy and procedure website. If you've printed this procedure, check the website to ensure you have the current version.

NOTE: The first appearance of terms in **bold** in this document (except titles) are defined terms – refer to the Definitions section.

1.0 PURPOSE

These procedures establish the processes that will be followed to respond, informally or formally, to a Report of bullying and harassment made under the Respectful Workplace and Bullying and Harassment Prevention ("the Policy").

2.0 SCOPE & COMPLIANCE

- 2.1** This procedure applies to all employees of Royal Roads University, including unionized and excluded employees, regardless of position or employment status. Refer to Respectful Workplace and Bullying and Harassment Prevention policy (insert link to policy once approved and available via the website).

3.0 PROCEDURE

3.1 Informal resolution

Any employee of the University who believes they are experiencing bullying and/or harassment should seek information and support. This can be found on the [RRU Bullying, Harassment and Discrimination website](#).

Depending upon the circumstances, it may be possible to resolve the matter informally without making a formal report to the University.

- a) Where appropriate, informal resolution can provide an opportunity to resolve a dispute in a mutually respectful manner, while preventing an escalation of the situation. Informal processes seek to resolve bullying and harassment complaints without a formal investigation into the merits of the allegations.
- b) This is done by facilitating communication between the people involved. The principal party must be comfortable with the method of resolution throughout the process, and their decision to end an informal resolution process in favour of a formal review should be respected and followed.
- c) Informal resolution includes speaking with the other party directly, with or without a support person, to request that the inappropriate behaviour stop immediately.

3.2 Formal resolution

When a verbal disclosure or written report is submitted to the employee's supervisor, another member of leadership and/or a member of People and Culture, this initiates a formal response. Once a supervisor, leader or member of the People and Culture team has received a verbal disclosure or a written report, they must respond to the report of bullying and harassment, taking all steps necessary to address the issue. This may include discussions, facilitated dialogue, an investigation, follow up reporting, and discipline. The University takes the health and safety of the community seriously, and once a response is initiated, the process toward resolution must be completed.

The response to the report must:

- Be undertaken promptly and diligently, and be as thorough as necessary in the circumstances
- Be fair and impartial, providing both the complainant and the subject of the complaint fairness in evaluating the allegations
- Be sensitive to the interests of the parties, and maintain confidentiality to the extent possible in the circumstances
- Be focused on finding facts and evidence, including interviews of the complainant, the subject, and any witnesses if necessary
- Incorporate, where necessary, the need for both the complainant and the subject of the investigation to have assistance during the investigation process
- Documented from initial reporting to resolution.

3.3 Process of reporting for an employee or witness

- a) An employee who believes they are experiencing bullying and/or harassed can complete, in addition to a verbal disclosure, the [Bullying and Harassment Report Form](#) (report form) and submit it to their supervisor or other leader, so that the appropriate information is received to proceed with next steps.
- b) If the report is about the employee's immediate manager or supervisor, the employee should complete the report form and submit it to People and Culture and, if comfortable doing so, should disclose the bullying and harassment to the person to whom the manager or supervisor reports.
- c) The report form describing the incident(s) should be completed as soon as possible after the bullying and harassment occurred so that the report can be addressed in a timely manner. All reports will be considered and assessed, regardless of when they are made, but a significant lapse of time may hinder the University's ability to take effective action.
- d) The supervisor/manager will review and assess the report and take appropriate and timely steps to respond to it, including notifying the complainant that the report has been received, if necessary.
- e) Where the report appears to involve discrimination, People and Culture will consult with the University's Office of Human Rights and Accessibility.
- f) Where a report is about the conduct of a person who is not a University employee, People and Culture will respond to it in a manner that is aligned with these procedures and contact the person directly.
- g) Where the report is about the conduct of a University employee, People and Culture will respond to the report in accordance with any relevant collective agreement or other applicable University policy or procedure, including notice requirements, timelines, and other related process issues.
- h) Where the report is about a University employee, the supervisor or manager* will
 - i. acknowledge receipt of the report;
 - ii. assess the risk to the complainant, the respondent, or others.
 - iii. assess the report, to determine whether the alleged conduct appears to meet the definition of bullying and harassment.

- iv. inform People and Culture, the union (based on the complainant's and respondent's positions at the University) that a report has been received and will consult or involve People and Culture and/or the union in addressing the matter, as appropriate,
- v. directly, or through the union of the complainant:
 - inform the complainant of their right to be accompanied by a support person and to have a member of the University or other organization present throughout all processes in these procedures; and
 - meet with the complainant about the report.
- vi. People and Culture will provide advice, guidance, and support to the respondent's supervisor in addressing the report.
- vii. directly, or through the respondent's supervisor:
 - inform the respondent that a report has been received;
 - inform the respondent's union of the report when required by a collective agreement;
 - inform the respondent of their right to be accompanied by a support person and to have a member of the University or their organization, if appropriate, present throughout all processes in these procedures; and
 - meet with the respondent about the report.

*People and Culture will provide support throughout the process as necessary.

3.4 Investigation of a Report

- a) People and Culture or the Office of Human Rights and Accessibility will determine whether and how to investigate the report, including whether to investigate it internally or whether the investigation will be undertaken by an external investigator. People and Culture will communicate its decision to both the complainant and the respondent in writing, with reasons.
- b) Where more than one report has been made about a respondent, People and Culture or the Office of Human Rights and Accessibility may decide that the reports will be investigated together.
- c) All investigations of University employees under these procedures must:

- i. be undertaken promptly and diligently, and be as thorough as necessary, given the circumstances;
 - ii. be objective, and be fair and impartial to both the Complainant and the Respondent when evaluating the allegations;
 - iii. comply with all relevant provisions in any applicable collective agreement or policy, including notice, timelines, and other process requirements;
 - iv. be sensitive to the interests of all parties involved and maintain confidentiality to the extent possible under the circumstances; and
 - v. be focused on finding facts and evidence, which includes interviewing the Complainant, the Respondent, witnesses, and such other persons as the investigator determines might have relevant information, as well as obtaining and reviewing any documents that the investigator considers may contain relevant information.
- d) Upon the conclusion of an investigation, the investigator will prepare a written report (“Investigator’s Report”) in a manner that facilitates compliance with the access to information and protection of privacy provisions of the Freedom of Information and Protection of Privacy Act (“FIPPA”).
- e) The investigator will submit the investigator’s report to People and Culture or the Office of Human Rights and Accessibility.
- f) The responsible office will provide a summary of the findings from the investigator’s report to both the complainant and the respondent (redacted as required for FIPPA compliance).

3.5 Decision and Corrective Measures

- a) People and Culture will provide a summary of the outcomes of the investigator’s report to the complainant and respondent’s supervisors or another leader, as appropriate.
- b) The respondent’s supervisor and People and Culture will determine the appropriate corrective measures or disciplinary sanctions applicable to the respondent.
- c) Where the respondent is covered by a collective agreement or other relevant employment policy, any discipline will be determined and imposed consistent with the terms of that agreement or policy.
- d) Corrective actions that arise from a bullying and harassment investigation will be reported monthly to the RRU JOHSC which will ensure that the recommendations and corrective actions are implemented promptly and effectively.

3.6 Restorative Measures

In all cases where it is determined that a violation of the policy has occurred, the University will make efforts to mitigate the impact of the incident(s) by taking actions and implementing measures to reduce the opportunity for recurrence and to restore a respectful working and learning environment.

3.7 Deliberately Misleading Reports

- a) Making a deliberately misleading report of bullying and harassment is prohibited conduct that is subject to a range of corrective and disciplinary measures. Making a report about bullying and harassment based on a genuinely held but mistaken belief that bullying and harassment occurred is not considered to be deliberately misleading.
- b) If the University determines that a deliberately misleading report of bullying and harassment was made, the responsible office will, in consultation with the supervisor, People and Culture and/or the union, consider disciplinary action.

3.8 Retaliation

- a) Retaliation is unacceptable and prohibited conduct that will be taken seriously by the University and may result in discipline. An allegation about retaliation can be made at any time.
- b) A University employee who has a concern about retaliation may choose to disclose it informally to their immediate manager or supervisor or their union for information, guidance, and support.
- c) Where a report involving an allegation of retaliation is received, People and Culture will normally respond to and manage it in the same way the responsible office responds to and manages other reports made under these procedures.
- d) The University reserves the right to address an allegation of retaliation under any University policy, process, or collective agreement, or by any external process that the University deems relevant and appropriate to the circumstances.

4.0 ACCESS TO INFORMATION, CONFIDENTIALITY, AND PROTECTION OF PRIVACY

The information and records made and received to administer the Policy and these procedures are subject to the access to information and protection of privacy provisions of British Columbia's *Freedom of Information and Protection of Privacy Act* and the University's Information Policy series. To the extent possible, the information and records will

be treated in a confidential manner, in compliance with the Act and with applicable University policies.

5.0 ACCOUNTABILITIES, ROLES & RESPONSIBILITIES

5.1 The Executive Officer and AVP, People and Culture is responsible for:

- a) ensuring consistent application of the procedures
- b) oversight of investigations ensuring they are prompt, fair and impartial and are conducted by qualified investigators
- b) ensuring appropriate resolution and follow up of reports

5.2 Individuals with Supervisory Responsibilities are responsible for:

Supervisors, managers, directors, deans, and executive leaders have a duty to act and are held accountable for addressing bullying and harassment within their areas of responsibility. This includes:

- a) Ensuring a healthy and safe work and learning environment, consistent with their obligations under the Workers Compensation Act and WorkSafeBC policies, by taking all reasonable steps to prevent, identify, and address Bullying and Harassment. This includes initiating proactive measures to promote respectful conduct and taking prompt and effective remedial action if Bullying or Harassment occurs or is reasonably suspected.
- b) Taking immediate and appropriate action upon becoming aware of a concern, whether raised formally or informally, directly or indirectly. Supervisors are responsible for addressing incidents and complaints of workplace Bullying and Harassment promptly, confidentially, and fairly, even where a written complaint has not been filed or the Complainant requests that no action be taken. Supervisors must assess the risk, take reasonable steps to address the behaviour, and seek advice from their Human Resource Consultant or appropriate senior leader as required.
- c) Documenting all steps taken in response to concerns or complaints, including informal matters, and maintaining such documentation in accordance with institutional and legal requirements.
- d) Ensuring that employees within their area are informed of this Policy and related procedures and educating themselves and their team members with respect to workplace Bullying and Harassment, including prevention, reporting options, and protections against retaliation.

- e) Actively seeking appropriate advice, guidance, and training to fulfill their responsibilities and to ensure compliance with legislative and institutional requirements.
- e) Participating in the resolution of informal disclosures, if needed, including engaging with the parties in appropriate informal processes, monitoring workplace dynamics following resolution, and ensuring that corrective measures are effective and sustained.
- g) Implementing and enforcing outcomes and recommendations arising from Formal Reports, which may include corrective action or discipline, and taking further steps as necessary to restore and maintain a respectful and safe work environment.

5.3 All individuals and University Employees:

Are expected to report bullying and harassment concerns promptly to their workplace leader (including: supervisors, managers, directors, deans, and executive members), provide accurate and relevant information, and participate in any resolution or investigation process. Workers must maintain confidentiality, cooperate with interim measures, and refrain from retaliation. All parties are expected to engage in the process in good faith and continue to conduct themselves in a professional manner throughout

Furthermore:

- Failure to maintain respectful conduct may lead to discipline up to and including termination of employment, and/or cancellation of contract.
- Students, visitors or guests found to be engaged in conduct constituting bullying, discrimination or harassment will be subject to remedy up to and including suspension from the University and/or removal of access to university facilities and grounds.

6.0 DEFINITIONS

6.1 Bullying and harassment

- a) Includes any inappropriate conduct or comment by a person towards an employee that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but,
- b) Excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Bullying and harassment may include:

- Incidents that adversely affects an employee's psychological or physical well-being;
- Repeated humiliation or intimidation that adversely affects an employee's psychological or physical well-being; and/or
- A single instance so serious that it has a lasting, harmful effect on an employee.

The behaviour's frequency and severity are both factors in whether the behaviour would be included in the definition of bullying and harassment. The behaviour may be written, verbal, physical, online, or electronic, a gesture or display, or any combination of these.

Examples of behaviors, conduct or comments, whether on-line or in person, that might constitute bullying and harassment include:

- verbal threats, aggression intimidation, insults or abuse
- calling someone derogatory names
- harmful hazing or initiation practices,
- vandalizing personal belongings,
- spreading malicious rumors Unwelcome remarks or jokes about subjects like race, religion, disability or age
- the display of sexist, racist or other offensive pictures or posters
- consistent subjection of an individual to practical jokes or ridicule
- unwelcome or inappropriate physical contact
- inappropriate use of power or control
- using on-line tools in ways that can be seen as cyberbullying (see definition)

6.2 Cyber Bullying

[Cyberbullying](#) is using online tools like websites, social media or texting to hurt, humiliate or threaten others (Government of BC On-line Safety). This includes using computers, smartphones or other connected devices to embarrass, hurt, mock, threaten or be mean to someone online (Public Safety Canada).

6.3 Discrimination and Harassment

RRU has a separate policy for Human Rights. This policy focuses on Discrimination and Discriminatory Harassment which may also constitute a breach of the British Columbia Human Rights Code.

Discrimination

- Occurs when a distinction, exclusion or preference imposes disadvantages on some individuals that are not imposed on others, and this treatment is based on one or more of the following prohibited grounds:
 - Race, colour, ancestry, place of origin, religion, family status, marital status, physical disability, mental disability, sex, age, sexual orientation, gender identity and expression, political belief or criminal or summary conviction unrelated to an individual's employment or intended employment.
- A distinction, exclusion or preference does not need to be intentional to be considered discriminatory.

Discriminatory harassment is:

- a form of discrimination where abusive, unfair, offensive, or demeaning treatment of a person or group of persons under any of these categories has taken place, and:
 - Has the effect of interfering with an individual's work or participation in work-related activities; or
 - Creates an intimidating, hostile, or offensive environment for work or participation in a work-related activity.

Personal Harassment is:

- any behaviour by a person directed against another person that a reasonable person would know or ought to know would cause offence, humiliation or intimidation.
- Behaviours include but are not limited to:
 - making derogatory comments to or about another person, swearing, yelling, and inappropriately interfering in another person's work, derogatory gestures, embarrassing practical jokes, ridicule, gossip, reckless disregard or denial of another's rights, improper use of power or authority or physical assault.

Sexual harassment is:

- Conduct or comment of a sexual nature made by a person who knows or ought reasonably to know that such conduct or comment is unwanted or unwelcome; or
- Expressed or implied promise of a reward for complying with a request of a sexual nature; or

- Actual reprisal or an expressed or implied threat of reprisal for refusal to comply with such a request; or
- Conduct or comment of a sexual nature which is intended to, or has the effect of creating an intimidating, hostile, or offensive environment.
- Reports of sexual violence or misconduct should be made in accordance with the [RRU Sexual Violence and Misconduct Policy](#)

6.4 Individuals

Individuals referred to in this policy includes all Members of the University Community (see definition) in their respective roles and relationship with the University,

6.5 University Community:

The University Community includes:

- employees, board members, students, volunteers, associate faculty and contractors engaged in a sanctioned university activity. For the purposes of this policy, university community also refers to guests, visitors and all individuals authorized to access Royal Roads information, information systems, facilities or equipment.

7.0 INTERPRETATION

Questions of interpretation or application of the parent policy (if any) or this procedure will be referred to the Executive Officer & AVP, People and Culture whose decision is final.

8.0 RELATED DOCUMENTS

- Respectful Workplace and Bullying and Harassment Prevention (policy)
- [Safe Disclosure](#) (policy)
- [Standards of Conduct and Service](#) (policy and guidelines)
- [Sexual Violence & Misconduct](#) (policy)
- [Student Rights and Responsibilities](#) (Policy)
- [Freedom of Information and Privacy](#) (policy)
- [Confidentiality](#) (policy)

8.1 Collective Agreements

- [RRUFA Collective Agreement](#)
- [CUPE Collective Agreement](#)

9.0 RELATED LEGISLATION AND INFORMATION

Government of Canada

- [Criminal Code of Canada: Consolidated Statutes and Regulation](#)
- [Canadian Charter of Rights and Freedoms](#)

Province of British Columbia

- [Civil Rights Protection Act RSBC 1996 c.49](#)
- [Royal Roads University Act](#)
- [WorkSafeBC Bullying and Harassment](#)
- [Freedom of Information and Protection of Privacy Act RSBC 1996 c.165](#)
- [Human Rights Code RSBC 1996 c.210, Part 1](#)
- [Multiculturalism Act RSBC 1996 c.321](#)

Review and Revision History

Date	Action
2013-Nov-01	Approved by Executive
2018-May-01	Revised; current published version
2026-March-24	Updated procedure title and content
Next Review	
March 2027	Review