SEXUAL VIOLENCE & HARASSMENT POLICY

Private Career College Students

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1. POLICY APPLICATION

This policy applies to all Private Career College students of Great Lakes Helicopter Corp. (GLHC).

2. THE SCOPE

The policy applies to complaints of sexual violence that have occurred on the GLHC campus or at one of our events and involving our students.

3. PURPOSE AND INTENT

All of Great Lakes Helicopter Corp's. Private Career College students have a right to study in an

environment free of sexual violence. This document sets out GLHC's policy on sexual violence involving Private Career College students, defines the prohibited behaviors, and outlines our investigative processes for sexual violence.

4. POLICY OBJECTIVES

Great Lakes Helicopter Corp. is committed to providing students with an educational environment free from sexual violence and treating those students who report incidents of sexual violence with dignity and respect.

To that end GLHC will provide a copy of the policy to all private career college students, and educate them together with management and employees about this policy and how to identify situations that involve, or could progress into sexual violence against students and how to reduce it.

Where a complaint has been made, under this policy, of sexual violence GLHC will take all reasonable steps to investigate it, including as follows:

- · providing on-campus investigation procedures to students for sexual violence complaints;
- responding promptly to any complaint and providing reasonable updates to the complainant and the respondents about the status of the investigation;
- assisting students who have experienced sexual violence in obtaining counselling and medical care;
- provide students who have experienced sexual violence with appropriate academic and other accommodation;
- provide students who have experienced sexual violence with information reporting options as set out in Appendix 1.

5. DEFINITION OF SEXUAL VIOLENCE

This policy prohibits sexual violence, which means any sexual act or act targeting a person's sexuality, gender identity or gender expression, whether the act is physical or psychological in nature, that is committed, threatened or attempted against a person without the person's consent, and includes sexual assault, sexual harassment, stalking, indecent exposure, voyeurism and sexual exploitation.

6. REPORTING AND RESPONDING TO SEXUAL VIOLENCE

Students and staff of GLHC will take all reasonable steps to prevent sexual violence involving students on campus or at a GLHC event by reporting immediately to the General Manager if a student has been subject to, or they have witnessed or have knowledge of sexual violence involving students, or have reason to believe that sexual violence has occurred or may occur which involves a student.

Any student who, in good faith, makes a report or complaint about sexual violence will not be subject to any sanctions or discipline for violations of GLHC's drug and alcohol use policies during the time the alleged violence occurred.

Once GLHC has received a report of sexual violence, appropriate support and other resources will be offered to the person who has experienced sexual violence, as well as to any person or group against whom an allegation of sexual violence is made.

Students will not be asked irrelevant questions during an investigation process (including regarding their sexual expression or past history) as a result of disclosing an experience of sexual violence whether through reporting an incident, making a complaint, accessing services or accessing supports for sexual violence

The General Manager recognizes the right of the complainant to determine how her or his complaint will be dealt with. However, in certain circumstances, the General Manager may be required by law or internal policies to initiate an internal investigation and/or inform police without the

complainant's concern, if believed the safety of members on campus or broader community are at risk.

A complainant seeking accommodation should contact the General Manager during normal GLHC business hours. 24 hour support resources throughout Ontario are listed in Appendix 1.

7. INVESTIGATION REPORTS OF SEXUAL VIOLENCE

A complaint of sexual violence may be filed under this policy, by any Private Career College student, to the General Manager in writing.

A complainant may ask another person to be present during the investigation.

Students will not be asked irrelevant questions during an investigation process (including regarding their sexual expression or past history) as a result of disclosing an experience of sexual violence whether through reporting an incident, making a complaint, accessing services or accessing supports for sexual violence

Upon a complaint of alleged sexual violence being made the General Manager will initiate an investigation, including as follows:

- determine whether the incident should be referred immediately to the police;
- determine what interim measures, if any, need to be taken during the investigation;
- meet with the complainant to determine the date and time of the incident, the persons
 involved, the names of any person who witnessed the incident and a complete description of
 what occurred;
- interview the complainant, any person involved in the incident may any identified witnesses;
- interview any other person who may have knowledge of incidents related to the complaint or any other similar incidents;
- inform the respondent of the complaint, providing details of the allegations and giving the respondent an opportunity to respond to those allegations;
- provide reasonable updates to the complainant and the respondents about the status of the investigation;
- · determine what disciplinary action, if any, should be

APPEAL PROCESS

Should the Complainant or the Respondent not agree with the decision resulting from the investigation, he or she may appeal the decision to Great Lakes Helicopter within three days by submitting a letter addressed to the General Manager advising of the person's intent to appeal the decision. A response will be provided within one business day or sooner to determine what next steps need to be taken to handle the appeal. Should an appeal process need to be set in place, the Complainant will be required to provide all details including the rationale for not accepting Great Lakes Helicopter's decision. Upon receipt of the formal appeal in writing, a review of the entire case will be set in motion by the General Manager

8. DISCIPLINARY MEASURES

If it is determined by GLHC that a Private Career College student has been involved in sexual violence, immediate disciplinary or corrective action will be taken up to and including termination of employment of instructors or staff or expulsion of a student.

In cases where criminal proceedings are initiated, GLHC will assist police agencies, lawyers, insurance companies, and courts to the fullest extent.

Where criminal and/or civil proceedings are commenced in respect of allegations of sexual violence GLHC may conduct its own independent investigation and make its own determination in accordance with its own policies and procedures.

9. MAKING FALSE STATEMENTS

It is a violation of this policy for anyone to knowingly make a false complaint of sexual violence or to provide false information about a complaint. Individuals who violate this policy are subject to disciplinary and/or corrective action, up to and including termination of employment or instructors or staff or expulsion of a student.

10.REPRISAL

It is a violation of this policy to retaliate or threaten to retaliate against a complainant who has brought forward a complaint of sexual violence, provided information related to a complaint, or otherwise been involved in the complaint investigation process. Any student who, in good faith, makes a report or complaint about sexual violence will not be subject to any sanctions or discipline for violations of GLHC's drug and alcohol use policies during the time the alleged violence occurred.

11.REVIEW

This policy will be reviewed every three years. GLHC shall ensure that student input is considered, in accordance with any regulations, every time the policy is renewed or amended.

12. COLLECTION OF STUDENT DATA

Great Lakes Helicopter Corp. shall collect and be prepared to provide upon request by the Superintendent of Private Career Colleges such data and information as required according to Subsection 32.3(8), (9) and (10) of Schedule 5 of the Private Career Colleges Act, 2005 as amended

13.RESOURCES

Appendix 1 lists local crisis centers.

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APPENDIX 1

ASSAULTED WOMEN'S HELPLINE - ENGLISH

Toll Free: 1-866-863-511

#safe (#7233) on Bell, Rogers, Fido or Telus Mobil TTY: 416-364-8762

www.awhl.org

Fem'aide - French

Toll Free: 1-877-336-2433

ATS: 1-866-860-7082

www.femaide.ca

Huronia Transition Homes

24 hour crisis line:

Barrie: 705-737-2008 or 1-800-987-0799

Midland: 705-526-4211 or 1-800-461-1750

Office: 705-526-3221

www.huroniatransitionhomes.ca

Bracebridge Muskoka/Parry Sound Sexual Assault Services Parry Sound: 705-774-9083 or 1-877-

851-6662 Muskoka: 705-646-2122 or 1-877-406-1268

SEXUAL ASSAULT CENTRE OF BRANTFORD

Crisis: 519-751-3471

Office: 519-751-1164

www.sacbrant.ca

CHATHAM-KENT SEXUAL ASSAULT CRISIS CENTRE

24 Hour Crisis Line: 519-354-8688

Office/TTY: 519-354-8908

www.cksacc.org

DISTRESS CENTRE DURHAM

24 hours: 905-430-2522 or 1-800-452-0688

www.distresscentredurham.com

Durham Rape Crisis Centre Crisis: 905-668-9200 Office: 905-444-9672 www.drcc.ca

COMMUNITY TORCHLIGHT – GUELPH/WELLINGTON/DUFFERIN 24 HOURS

Distress: 519-821-3760 or 1-888-821-3760

Crisis: 519-821-0140 or 1-877-822-0140

Telecheck: 519-415-3764

Emergency Shelter Resource line: 1-888-821-3760 www.communitytorchlight.com

Guelph-Wellington Women in Crisis

24 Hour Crisis: 519-836-5710 or 1-800-265-7233 Office: 519-823-5806

www.gwwomenincrisis.org

SEXUAL ASSAULT CENTRE (HAMILTON & AREA)

Crisis: 905-525-4162

Office: 905-525-4573

TTY: 905-525-4592

www.sacha.ca

SEXUAL ASSAULT SUPPORT CENTRE OF WATERLOO REGION CRISIS: 519-741-8633

Office: 509-571-0121

www.kwsasc.org

CRISIS SERVICES OF WATERLOO REGION

24 hour Crisis: 1-866-366-4566

Distress: 519-745-1166

EARS: 1-800-553-2377

(advocate for male victims of sexual assault)

LONDON & DISTRICT DISTRESS CENTRE HELPLINE

24 hours

Distress: 519-667-6711

Crisis: 519-433-2023

www.londondistresscentre.com

SEXUAL ASSAULT CENTRE LONDON CRISIS: 519-438-2272

Office: 519-439-0844

TTY: 519-439-0690

www.sacl.ca

LONDON ABUSED WOMEN'S CENTRE

Office: 519-432-2204

www.lawc.on.ca Peel Region Hope 24/7

24 hour crisis: 1-800-810-0180

Office: 905-792-0821

www.hope247.ca

WOMEN'S SUPPORT NETWORK OF YORK REGION

Crisis: 1-800-263-6734

Office: 905-895-3646

www.womenssupportnetwork.ca

SEXUAL ASSAULT & VIOLENCE INTERVENTION SERVICES OF HALTON CRISIS:

1-877-2688416

Office: 905-825-3622

www.savisofhalton.org

FAMILY TRANSITION PLACE

Crisis: 1-800-265-9178

Office: 519-942-4122

www.familytransitionplace.ca

SEXUAL ASSAULT SURVIVORS CENTRE SARNIA-LAMBTON

Crisis: 519-337-3320 or 1-888-231-0536

Office: 519-337-3154

HALDIMAND & NORFOLK WOMEN'S SERVICE

Crisis: 1-800-265-8076

TTY: 1-800-815-6419

Office: 519-426-8048

www.hnws.on.ca

NIAGARA REGION SEXUAL ASSAULT CENTRE

Crisis: 905-682-4584

Office: 905-682-7258

www.sexualassaultniagra.org

OASIS CENTRE DES FEMMES - FRENCH

Tel: 416-591-6565

www.oasisfemmes.org

Toronto Rape Crisis Centre (Multicultural Woman Against Rape) Crisis: 416-597-8808

Office: 416-597-1171

www.trccmwar.ca

SEXUAL ASSAULT CRISIS CENTRE OF ESSEX COUNTY

Crisis: 519-253-9667

www.sacwindsor.net

WOODSTOCK

Domestic Abuse Services Oxford Crisis: 1-800-265-1938

www.daso.ca

CONFIDENTIALITY

Confidentiality is an important principal in creating an environment where those who have experienced sexual violence feel safe to disclose and seek support and accommodation. The privacy and confidentiality of all members of GLHC's community involved in any complaint, will be protected to the extent possible, but may be precluded where, an individual may be at risk of self-harm or harming another, reporting is required by law or when GLHC has an obligation to investigate.

MAINTENANCE OF STATISTICS

GLHC will maintain annual statistics, without identifying information, on disclosed and reported incidents of sexual violence on campus in accordance with Private Career Colleges Act and provincial regulations.