

Action Chelsea for the Respect of the Environment (ACRE)

Policy on the Prevention and Management of Psychological or Sexual Harassment

Approved by the Board of Directors on March 17th, 2026



1) OBJECTIVES

The objectives of this policy are to:

- affirm ACRE's commitment to preventing and putting an end to all situations of psychological or sexual harassment related to work, including harassment originating from external sources;
- outline the measures put in place to prevent harassment, including the information and training programs offered;
- establish the procedure for handling complaints and problematic situations brought to ACRE's attention through reports or disclosures.

2) SCOPE

This policy applies to all workers who, under *the [Act respecting occupational health and safety](#)*, are persons who perform work for ACRE under a contract of employment or apprenticeship contract¹, including unpaid work, at all hierarchical levels, particularly in the following locations and contexts:

- workplaces, including remote work locations, where applicable;
- any other location where workers may be present in the course of their work (e.g., meetings, training sessions, travel);
- work-related social activities.

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

3) DEFINITION

The *[Act respecting labour standards](#)* defines psychological harassment as follows²:

“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.”

¹ The exception applies to individuals employed as managers, superintendents, forepersons, or representatives of the employer in its relations with workers, as well as directors or officers of a legal entity, unless a person acts in such a capacity toward their employer after having been designated by the workers or by a certified association.

² See Appendix 1 of this policy for further details.

This definition includes discriminatory harassment related to any of the grounds set out in the Charter of Human Rights and Freedoms³.

4) POLICY STATEMENT

a) Administrative Rule

ACRE does not tolerate or condone any form of harassment in the workplace.

Any person who violates this policy will be subject to appropriate disciplinary measures. The selection of the applicable measure will take into account the severity and consequences of the conduct, as well as the individual's prior record.

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

b) Responsibilities of Workers

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

- contribute to maintaining a workplace free from harassment;
- treat others with respect in the course of their work;
- participate in the mechanisms implemented by ACRE to prevent and stop harassment;
- report, as soon as possible, any situation involving harassment to one of the individuals designated by ACRE to receive and address complaints and reports.

c) Prevention of Psychological or Sexual Harassment

ACRE is committed to taking reasonable measures to provide a workplace free from all forms of harassment in order to protect individuals' dignity as well as their psychological and physical integrity.

In accordance with its legal obligations, ACRE implements measures to identify, control, and eliminate risks of psychological or sexual harassment, including:

- a) distributing this policy to ensure it is accessible to all workers;
- b) maintaining ongoing monitoring of risks and risk factors that may give rise to harassment situations, including those listed in Appendix 1 of this policy;
- c) promoting respect among individuals;
- d) holding meetings with individuals who leave their employment to understand the reasons for their departure;
- e) establishing a prompt complaint and report-handling process while ensuring the safety of all individuals involved.

d) Handling of Complaints and Reports

³ These grounds for discrimination are listed in Appendix 1.

Any worker who believes they are experiencing work-related harassment may file a complaint so that ACRE can take the necessary actions to correct the situation.

All workers, including those who witness behaviours or conduct that may constitute harassment or could potentially develop into harassment, may also submit a report to bring the situation to ACRE's attention.

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

ACRE undertakes to:

- designate a person to receive and handle complaints;
- address complaints or reports as promptly as possible;
- protect the dignity and privacy of all individuals involved, namely the person who filed the complaint or report, the person concerned, and any witnesses;
- ensure that all individuals involved are treated with humanity, fairness, and objectivity, and that appropriate support is provided;
- protect the confidentiality of the intervention process, including information related to the complaint or report;
- offer the possibility, with the consent of the individuals concerned and where appropriate, of a mediation meeting to resolve the situation, ensuring that such support takes place in a neutral and impartial context;
- conduct, when necessary, a timely, objective, neutral, and impartial investigation or, if internal resources are unavailable or lack the required expertise, assign the responsibility to an external investigator in order to preserve impartiality and ensure quality. The individuals concerned will be informed of the outcome of this process. If the investigation does not establish that inappropriate conduct occurred, all physical evidence will be retained for two years and then destroyed;
- take all reasonable measures to resolve the situation, including appropriate disciplinary measures;
- review existing harassment prevention measures to ensure their continued effectiveness and to prevent recurrence of similar situations.

The person designated by ACRE to receive and handle complaints is primarily responsible for:

- informing workers about ACRE's policy on psychological or sexual harassment;
- receiving complaints and reports;
- assessing each request and recommending appropriate actions or interventions (e.g., individual meetings, mediation, investigation), depending on the context;
- determining the appropriate qualified person who will be responsible for the intervention;
- following up to ensure that the individuals involved are adequately supported and that the intervention has achieved the desired outcomes.

ACRE will ensure that:

- the individuals designated to receive and handle complaints and reports are properly trained to carry out the responsibilities assigned to them, and have the necessary skills and tools available to process and follow up on complaints or reports, including in relation to assessing allegations of harassment with a view to recommending an administrative investigation;

- work time is allocated to allow these designated individuals to perform the duties assigned to them.

5) POLICY REVIEW

The Policy on the Prevention and Management of Psychological or Sexual Harassment will be reviewed every two years and whenever there is a material change in circumstances.

APPENDIX 1 – RECOGNIZING PSYCHOLOGICAL OR SEXUAL HARASSMENT

The [Act respecting labour standards](#) provides criteria to determine what may be considered psychological or sexual harassment, namely:

- vexatious conduct (hurtful, humiliating);
- manifested in a repeated manner or through a single serious incident;
- carried out in a hostile (aggressive, threatening) or unwanted manner;
- affecting a person’s dignity or psychological or physical integrity;
- resulting in a harmful (damaging, adverse) work environment for the individual.

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, disability, or the use of any means to palliate a disability) may also constitute harassment.

This definition applies to all work contexts, including remote work and participation in work-related social activities.

By way of example, the following behaviours may be considered vexatious conduct constituting harassment if they meet all the criteria set out in the legal definition:

Behaviours that may be related to psychological harassment

- intimidation and cyberbullying
- threats, isolation
- offensive or defamatory remarks or gestures directed at a person or their work
- verbal violence
- belittling or denigration

Behaviours that may be related to sexual harassment

- any form of unwanted attention or advances of a sexual nature, such as:
 - persistent solicitation
 - unwanted looks or physical contact
 - sexist insults or crude remarks
 - sexual comments, jokes, or images

ACRE has an obligation to intervene when a problematic situation involving harassment, or a risk of harassment, is brought to its attention. However, where possible and appropriate, it is considered good practice for the person who believes they are experiencing inappropriate behaviour in the workplace to inform the individual concerned that the behaviour is unwanted before filing a complaint or report. They should also note the date and details of the incidents, as well as any steps taken to try to resolve the situation.

If no action is possible, or if the behaviour continues despite an initial approach, the situation should be brought to the attention of the individuals designated by ACRE to receive and handle complaints and reports so that appropriate intervention can be carried out.

Preventing Risks to Psychological Health: A Shared Responsibility

The Act respecting occupational health and safety states, in section 51, that the employer must take the necessary measures to protect the health and ensure the safety and physical and psychological integrity of workers. In particular, the employer must use methods and techniques aimed at identifying, controlling, and eliminating risks that may affect the health and safety of workers, including harassment.

The same Act also sets out, in section 49, the obligations of workers, including the duty to take the necessary measures to protect their own health, safety, and physical or psychological integrity, and to ensure that they do not endanger the health, safety, or physical or psychological integrity of other persons in the workplace or in its vicinity.

For more information and links to tools made available by the CNESST (in French)

- [Harcèlement au travail | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Prévenir le harcèlement et intervenir | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Risques psychosociaux liés au travail | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)

Training and webinars (in French)

- [Webinaire - Démystifier le harcèlement psychologique ou sexuel au travail](#) (available on demand at any time)
- [Formation en ligne les normes du travail à votre portée](#) : module on psychological or sexual harassment and explanation of the steps involved in the processing of a complaint with the CNESST

Capsules et videos (in French)

- [Exemples de situation de harcèlement au travail](#)
- [La médiation : un service qui favorise la résolution rapide et harmonieuse d'un conflit](#)
- [Harcèlement psychologique ou sexuel au travail - Notre expert vous informe](#)

Publications (in French)

- [Aide-mémoire – Harcèlement au travail | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Comprendre et prévenir le harcèlement psychologique ou sexuel au travail - Guide pratique de l'employeur](#)
- [Le harcèlement psychologique ou sexuel, parlons-en!](#)

APPENDIX 2 – COMMITMENT OF PERSONS DESIGNATED BY ACRE TO RECEIVE AND HANDLE COMPLAINTS AND REPORTS RELATED TO PSYCHOLOGICAL HARASSMENT IN THE WORKPLACE

Engagement

I hereby declare my commitment to comply with ACRE’s Policy on the Prevention and Management of Psychological or Sexual Harassment. I confirm that my recommendations and interventions will be impartial, respectful, and confidential.

Name of the designated person

Signature of the designated person

Date