



## POLICY

### to Prevent Harassment & Bullying and to Promote a Safe and Healthy Environment

#### Background

This policy is in accordance with the principles of the Quebec *Charter of Human Rights and Freedoms*, which recognizes that every human being has the right to be treated with dignity, at all times. Therefore, any form of harassment, intimidation or abuse of authority is a violation of fundamental human rights.

The National Theatre School (NTS) hereby declares that no form of harassment, intimidation or abuse of authority will be tolerated, regardless of its source, to provide a healthy environment for the personal and professional development of everyone.

#### Objectives

Through this policy, NTS intends to:

- Tolerate no form of harassment, intimidation, or abuse of authority.
- Create a work and training environment where everyone is treated with respect and dignity.
- Prevent harassment, intimidation, incivility, or abuse of authority among members of the NTS community, within its two buildings, Saint-Denis and Monument-National, but also, and without being limited to, employees of its other entities such as the Centre for Arts and Social Innovation, or the NTS DramaFest.
- Encourage accountability among all members of the community through timely dialogue or third-party intervention to prevent the deterioration of a situation deemed unfair.

#### Definitions

Harassment is defined as any unwanted conduct, whether express or implied, that is unwelcome, hurtful, and offensive by one person towards another individual or groups of persons, and which the perpetrator knew or should reasonably have known would cause offence or harm. It also includes any act, comment or display that demeans, belittles, humiliates, or embarrasses a person, and any act of intimidation, threat or discrimination.

Harassment is usually related to repeated events, although it may be related to a single serious incident.

Bullying is any intentional or unintentional behaviour, word, act or gesture, expressed directly or indirectly, including in cyberspace, in a context of unequal formal or informal power relations between the persons involved, that results in feelings of distress, injury, oppression or ostracism.



## POLICY

### to Prevent Harassment & Bullying and to Promote a Safe and Healthy Environment

Abuse of authority or power is considered prohibited harassment under this policy. It is defined as the exercise of authority or power in an abusive and morally coercive manner. Conversely, normal training requirements or the fulfillment of management rights will not be considered harassment.

#### Scope of Application

The School is committed to raising awareness among its staff, students and partners about harassment in its broadest sense. Students, instructors, staff members, including temporary or freelance employees under contract at NTS, and management are required, at all times, to have an attitude and behavior that is respectful of everyone's dignity. These obligations are even more important in a hierarchical relationship.

Teaching performing arts requires a great deal of mutual trust and empathy, as the nature of the training requires students to tap into their vulnerability, their own reality, and their emotions. All staff members, both regular and under contract, are responsible for the artistic, pedagogical, and professional development of students, using methods and approaches that create a healthy, safe, respectful, and trusting learning environment.

All parties are responsible for adopting behaviors that are welcoming and supportive of each other to generate the mutual trust necessary for a healthy and respectful environment. Reciprocally, all parties have a responsibility to communicate quickly any discomfort felt during interactions to prevent any degradation of interpersonal relationships. An adjustment of the favored approaches may then be determined between the parties through dialogue, without compromising the mission of the School, the objectives of the training or the realization of the projects and mandates to which the parties are bound.

The policy applies to all incidents related to training or work environment, whether at NTS, or outside of these locations, as well as during and outside of normal working or training hours, for example, at productions, conferences, meetings, receptions, and social events, when these activities are related to NTS business.

NTS also has a policy to prevent and fight sexual violence. It is agreed that any inappropriate or unwanted sexual behaviour or sexual violence is covered by this other policy and may result in a formal complaint.



## Guiding Principles

### *Protection of Rights and Interpersonal Relationships*

The obligations of the parties in all situations covered by this policy are to act in a manner that ensures that everyone's rights are protected and that a quality relationship is maintained between them and with all other parties.

Individuals subject to this policy shall adopt a behaviour and attitude that always ensures the realization of the above principle.

### *Principle Statement*

Harassment and bullying are prohibited. NTS will not tolerate it. Management preserves the right to act at any time, whether a complaint is filed or not, or withdrawn, when there is reasonable cause to believe that a violation of this policy has occurred.

Any violation of this policy will result in administrative or disciplinary action against the perpetrator, which may include dismissal from the School or termination of employment (including cancellation of contracts, if applicable), depending on the legal status of the individual involved.

### *Impartiality and Promptness*

Any complaint of harassment and/or bullying will be dealt with promptly and impartially.

### *Discretion and confidentiality by all parties*

Any disclosure or formal complaint will be treated with discretion and confidentiality by all parties involved in order to prevent the situation from escalating.

A disclosure is defined as "the fact that a person reveals that he or she has been the victim of psychological harassment, intimidation or abuse of authority. Disclosure does not necessarily lead to a formal complaint.

However, it is understood that any information required to process the complaint may be disclosed by the responsible party, without relieving that party of the confidentiality and discretion to which they remain liable. It is understood that the refusal of the disclosing or complaining party may prevent the complaint from being processed.

### *Early Access to Informal Complaint Management*



## POLICY

### to Prevent Harassment & Bullying and to Promote a Safe and Healthy Environment

Although the responsible and autonomous management of problems encountered by the parties themselves is greatly encouraged, everyone can contact the Ombudsperson appointed by the NTS before filing a formal complaint. This external resource is dedicated to the prevention of harassment, bullying or abuse of power and can be contacted at any time to seek listening, advice, coaching or to request a neutral and impartial intervention. Mediation and administrative investigation are among the possible services, when recommended by the Ombudsperson and authorized by the Chief Executive Officer (CEO). In no case may informal interventions be used to limit the management rights of community members or to limit their obligations and responsibilities.

The use of the internal mechanisms proposed by this policy does not deprive the complainant of using other legal means if he or she so desires. However, the two processes cannot be conducted in parallel, as the legal process prevails over the informal one.

#### *Using the Complaint Processes*

Individuals who, in good faith, avail themselves of the policy are protected from retaliation (sanctions or other measures having a negative impact) that might be aimed at them because they have used the policy or collaborated with the objectives. The same applies to witnesses. A complaint deemed frivolous or profane, i.e., filed in bad faith, will be considered a violation of this policy and sanctions will be applied as necessary.

#### *Interpreting the Policy*

All aspects of the policy must be interpreted in a way that protects the fundamental rights of individuals and fosters a healthy, respectful, and fair environment.

Disclosure is defined as “the act of an individual disclosing that he or she has been the victim of psychological harassment, intimidation or abuse of authority”. Disclosure does not necessarily lead to a formal complaint.

However, it is understood that any information required to process the complaint may be disclosed by the responsible party, without relieving that party of the confidentiality and discretion to which they remain liable. It is understood that a refusal of the disclosing or complaining party may prevent the complaint from being processed.



## POLICY

### to Prevent Harassment & Bullying and to Promote a Safe and Healthy Environment

#### Accountability of Community Members

The entire NTS community is involved in the implementation of this policy. They are responsible for identifying and discouraging comments or activities that are in violation of this policy and informing those involved that their behaviour is inappropriate.

To do so, they must engage in a respectful dialogue with the concerned parties that fosters an open exchange and awareness of different points of view. The dialogue must be carried out in a constructive manner with the aim of reaching a consensus on how to resolve the problematic situation.

Management is responsible for promoting the importance of compliance with the policy and its underlying principles, and for acting promptly when a situation of harassment, bullying or abuse of authority is brought to their attention, as well as setting an example through their own behaviour and attitudes. To minimize the need to repeat, interrupt or start over certain administrative processes, NTS has set up a "One-Stop-Shop" to provide a listening ear or guidance for anyone who wishes to report or file a complaint. Should one or all of the parties require a neutral, impartial, external resource with expertise in conflict prevention to listen, advise, accompany or assist them, they may contact the Ombudsperson identified in this policy.

#### Code of Conduct Regarding Staff-Student Relationships

As stated in the Policy to Prevent and Fight Sexual Violence, NTS subscribes to the principles set forth by the Ministère de l'Éducation et de l'Enseignement Supérieur to "control intimate, romantic and sexual relationships" that may develop between a student and a person "who has an influence on the student's academic progress". Thus, all employees, whether permanent or under temporary contract, must avoid intimate, romantic or sexual relationships with students with whom they have a reasonable expectation of a teaching relationship or supervision responsibilities, even if the relationship is consensual.

Any employee, permanent or contractual, who finds himself or herself in such a situation is required to notify in writing, as soon as possible, the existence of the relationship to a third party (either the CEO, the Artistic Director of the English or French section, or his or her department head, depending on the hierarchical relationship), who shall take measures to protect the student, if any, or, at the very least, shall provide a mechanism to ensure that this has no impact on the student's training path. In any case, management will be required to forward a copy of the statement to the NTS Human Resources Department to be kept in a confidential file, and for statistical purposes.



## Complaint Handling Process

### 1) *Informal Procedure*

- a. Anyone who believes they are being harassed or bullied is encouraged to address the issue, whenever possible, with the person involved.
- b. Any person subject to NTS policy has the right, at all times, to be heard, to seek advice, to be coached, or to request an intervention:

#### For students

##### **Person in charge of intervention and prevention**

The NTS Student Services Manager will support the Ombudsperson and act as an intervention and prevention officer. He will inform students about the Policy and the disclosure, reporting or complaint processes. Disclosures, reports, or complaints, as well as potential requests for intervention, should be directed to the Ombudsperson.

#### For Staff Members

##### **Person in Charge of Prevention**

The Associate Director of Human Resources is entitled to inform, guide, and educate staff about the policy and procedures. Disclosures, reports, or complaints, as well as potential requests for intervention, should be directed to the Ombudsperson.

You can contact the Ombudsperson at any time using the following contact information:

**Caroline Lemay, Ombudsperson @ : [ombuds.ent.nts@omega-ombs.ca](mailto:ombuds.ent.nts@omega-ombs.ca)**

This is not an emergency service. In case of an emergency, please consult other external resources or call 911.

The turnaround time for communications is about 48 hours (excluding weekends and holidays). The service is confidential and is intended for complainants, respondents or witnesses of a situation considered problematic.

Any student or permanent employee who finds themselves in a state of psychological or emotional distress is invited to contact the appropriate specialized services (i.e. psychologist), either through the psychological support program offered to students, or through the Employee Assistance Program or the employees' group insurance.



c. Those wishing to contact the Ombudsperson may collaborate in the process, although the possible intervention is not limited to:

- Gather relevant information to evaluate whether the situation is harassment or inappropriate behavior.
- Discuss to help define the nature and scope of the problem and explore with the individual(s) possible directions for autonomous and informal management of the issue.
- Inform the individual(s) of their rights and any existing options in the policy.
- Assist in setting up any temporary preventive measures for the assistance, support and protection of the student or employee, as needed.
- Act, upon the consent of the complainant(s), to inform the person against whom the complaint has been lodged of the alleged behaviours and propose a mediation session to resolve the issue to put an end to the alleged behaviours.
- Prepare and assist the involved party(ies) in dealing with the administration when necessary to process the complaint.
- Follow up with the concerned parties within a few days following the processing of the complaint to verify whether the agreement reached between them and the person against which they filed the complaint has corrected the issue.
- Initiate an administrative investigation process, following formal authorization from the CEO.

The involvement of an external resource does not in any way deprive the parties involved of the ability to resolve the situation independently or with a mutually agreed upon and trusted NTS staff member.

## II) *Formal Procedure*

a. If informal procedures are not successful, or if the complainant considers themselves to be a victim and does not intend to use such procedures for a reasonable reason, they may file a formal written complaint directly to the Ombudsperson.

Such complaint must be detailed, filed within a reasonable time after the event, and must be signed and dated (see Complaint Form, Appendix 2).

b. When the Ombudsperson is seized of the file, they shall notify the CEO, as soon as possible, that a complaint has been filed in order to obtain authorization to proceed with an admissibility hearing first.



**c. Delegated Authority:** Should the CEO be involved or witness in a case, it is intended that the NTS Board of Directors (specifically the Executive Officers) will be assigned to the case, in lieu of the CEO.

Following the Ombudsperson's determination of the reasonableness of the complaint, the alleged respondent is informed of the claims made against them. They are then called upon to give their version of the facts.

### III) *The Investigation Process*

As part of the investigation, the Ombudsperson will:

- Receive a written complaint and other relevant documents.
- Remind the parties of their rights (including the right to be accompanied by a person of their choice who is not otherwise involved as a witness) and responsibilities, including those related to the confidentiality of the process.
- Meet with the parties, accompanied if they wish, to identify witnesses and, if necessary, meet with them.
- Obtain written and signed statements from the parties and witnesses, except for witnesses who may, for various reasons, including distance, be interviewed by telephone or e-mail.
- Within thirty-five (35) days thereafter, prepare an investigation report that includes, but is not limited to, a summary of collected facts and evidence, an analysis of the evidence, and a conclusion on each of the allegations as to whether the complaint is substantiated, in whole or in part, unfounded, or vexatious, and submit the report to the CEO.
- Obtain authorization from the CEO, in extraordinary cases, to extend their investigation beyond thirty-five (35) days and inform the parties involved.

### IV) *The Decision*

The CEO shall, as soon as possible after receiving the investigation report, notify the parties of the conclusions of the report; the investigation report is a confidential internal administrative document that will not be released to the parties.

The CEO and will decide regarding administrative and/or disciplinary action and communicate it to the parties.





## POLICY

### to Prevent Harassment & Bullying and to Promote a Safe and Healthy Environment

#### V) *Corrective Actions*

The appropriate corrective action(s) will be selected based on the gravity of the prohibited conduct and other relevant circumstances, including the offender's record and active participation in the process. Such action, whether administrative or disciplinary or any combination thereof, may include any one or more of the following:

- Interim measures prior to and during the investigation, such as administrative suspension for investigation, leave of absence, with or without pay.
- A formal apology.
- A verbal or written reprimand, with a note on file.
- Mandatory attendance to a training session on appropriate behaviours in the training or workplace environment.
- Consulting with specialized resources..
- Coaching session(s).
- Suspension or probation for a specified period of time.
  
- Demotion.
- Dismissal / termination of employment.
- Loss of Privilege;
- Any other appropriate sanction based on the act committed or the harm suffered by the victim.

#### Acknowledgement

Everyone in the community will be required to acknowledge receipt of this policy and state that they understand its terms (see suggested Acknowledgement Form in Appendix 3).

This policy was adopted on February 1, 2018 and is effective as of that date. The policy has been subject to periodic amendments. The last review and amendment is as of April 28, 2023.



Appendix 1

**POLICY TO PREVENT HARASSMENT & INTIMIDATION AND PROMOTE A HEALTHY AND  
SAFE ENVIRONMENT  
SUMMARY OF PROCESS FOR STUDENTS AND STAFF**

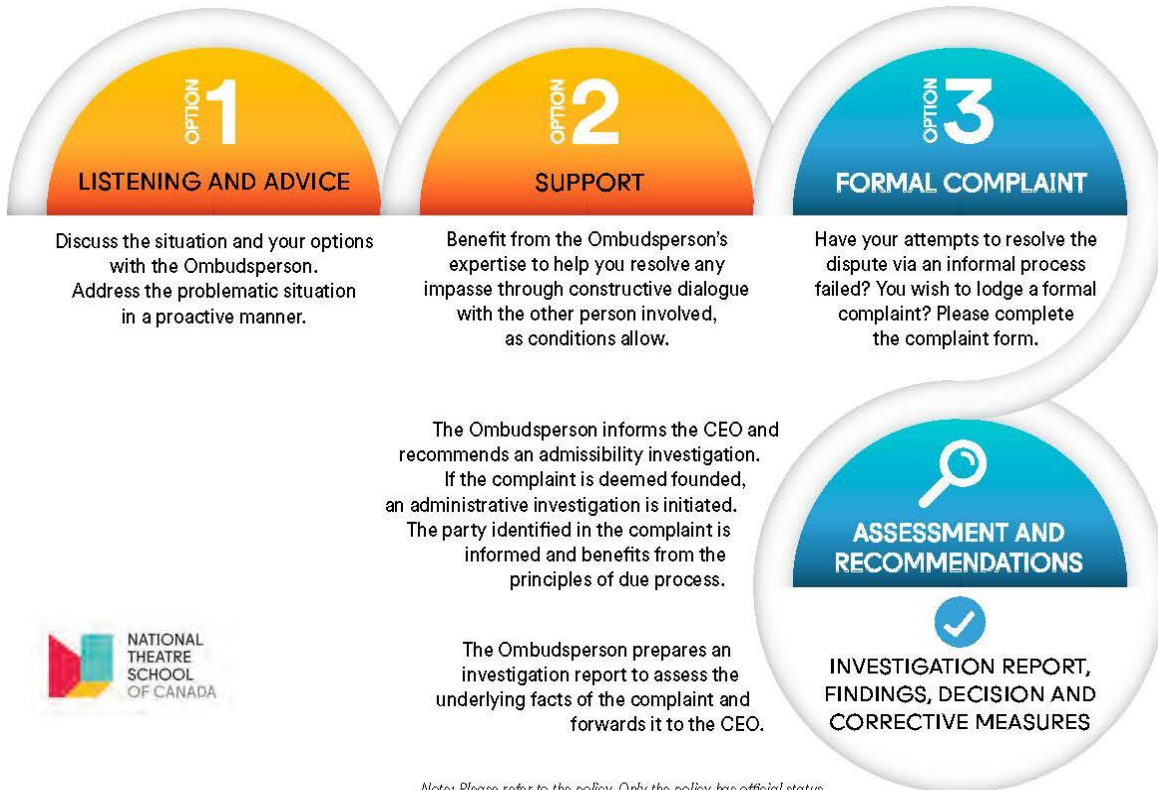
**QUESTIONS, PROBLEMATIC OR UNCOMFORTABLE SITUATIONS**



Contact **Caroline Lemay**, an independent specialist designated by NTS.  
[ombuds.ent.nts@omega-ombs.ca](mailto:ombuds.ent.nts@omega-ombs.ca)

INFORMAL PROCESS

FORMAL PROCESS



*Note: Please refer to the policy. Only the policy has official status.*



**APPENDIX 2 : COMPLAINT FORM**

**I believe I am a victim** of some form of harassment:

Psychological  Abuse of authority

Bullying  Other  Specify:

---

**Contact Information:**

Full Name:

Training program or administrative department, as applicable.

Cell Phone : Email:

---

**Contact information of the respondent (against whom the complaint is made):**

Full Name:

Status (employee, student, other):

---

**Name(s) of witness(es) identified by the complainant:**

Full Name: Cell phone or email:

Full Name: Cell phone or email:

---

**Desired solution(s):**

**Other measures taken:**

Did you express your disapproval to the respondent? Yes  No

If so, what was the nature and outcome of the discussion? Please specify:

If not, what factors have deterred you from doing so? Please specify:

Would you be willing to try to resolve the issue through mediation??

Yes  No

*\*\*Refusing mediation does not prejudice the complainant. However, the refusal to mediate must be for reasonable cause.*

**Have you taken any other actions, such as filing a complaint with the Human Rights Commission or a police department?**

Yes,  Specify which one No



ÉCOLE  
NATIONALE  
DE THÉÂTRE  
DU CANADA

NATIONAL  
THEATRE  
SCHOOL  
OF CANADA

## POLICY to Prevent Harassment & Bullying and to Promote a Safe and Healthy Environment

### APPENDIX 3

#### ACKNOWLEDGEMENT AND COMMITMENT

(To be removed and placed in the employee's or student's file)

I acknowledge that I have read and that I understand the provisions of the National Theatre School of Canada (NTS) **Policy to Prevent Harassment and Bullying and to Promote a Healthy Environment**. If I have any questions or misunderstandings, I have been given the opportunity to discuss them with my manager, department head or program director or to contact the Ombudsperson for clarification.

I also fully understand and agree that the provisions of this policy are an integral part of my employment or educational contract, and I hereby agree to abide by its terms, including any amendments made to it by NTS.

\_\_\_\_\_  
Name (in print characters)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date