Policy on Sexual Violence and Harassment

(Revised and updated in compliance with the Ontario Career Colleges Act 2005, Ontario Regulation 415/06, Bill 132, Ontario Human Rights Code, Occupational Health and Safety Act, and applicable Legislation as Amended – August 12, 2024)

---

1. Policy Application

Freedom College of Business, Healthcare and Technology Inc. Is committed to provide a safe, respectful, inclusive and supportive learning environment free from all forms of sexual violence, sexual harassment, discrimination, intimidation and retaliation.

Freedom College recognizes that sexual violence can have a profound impact on individuals and communities. Every Student, employees, instructors, administrator, contractor, practicum partner, and visitor has a right to participate in an environment where dignity, respect, safety and human rights are protected.

This policy applies to all students, faculty, staff, contractors, and stakeholders associated with Freedom College of Business, Healthcare, and Technology Inc. Freedom College is dedicated to fostering a positive, respectful, and inclusive environment. We believe in treating all individuals with fairness, dignity, and respect, and expect all members of our community to uphold these values. The College has an obligation to provide its students with an educational environment free from sexual violence and harassment and is committed to addressing these issues through comprehensive education, prevention strategies, support systems, and strict adherence to legislative requirements.

Freedom College maintains a zero-tolerance approach to sexual violence and harassment. Any form of sexual violence, misconduct, harassment and exploitation, or retaliation is unacceptable and will be addressed promptly, fairly and appropriately.

The College is committed to:

- Preventing sexual violence through education, awareness and training.
- Support individuals affected by sexual violence
- Provide accessible options.
- Respecting individual choices regarding disclosure and investigation.
- Protecting confidentiality and privacy.
- Ensuring procedural fairness for all individuals involved.
- Taking appropriate action when misconduct is substantiated.

This policy has been developed and implemented in accordance with the requirements of:

- Career Colleges Act, 2005
- Ontario Regulation 415/06

- Ontario Régulation 415/06, Section 36.02- Sexual Violence Policy Requirements
- Sexual Violence and Harassment Action Plan Act (Bill 132)
- Ontario Human Rights Code
- Occupational Health and Safety Act
- Applicable privacy and confidential legislation

Freedom College recognizes and incorporates the requirements of:

Reg. 415/06, s. 36.0.2(1) (d.1)

The College will ensure that individuals who report sexual violence in good faith will not be subject to discipline for violations of the College's drug or alcohol policies that may have occurred in connection with the incident.

O. Reg. 415/06, s. 36.0.2(2)2

The College will establish measures to protect individuals from retaliation or threats of retaliation.

O. Reg. 415/06, s. 36.0.2(2)3

The College will establish a process for determining whether an incident or complaint will be investigated.

O. Reg. 415/06, s. 36.0.2(2)4

The College recognizes that an individual affected by sexual violence may choose not to request an investigation and has the right not to participate in an investigation.

O. Reg. 415/06, s. 36.0.2(2)7

The College will ensure procedural fairness throughout investigation and decision-making processes.

O. Reg. 415/06, s. 36.0.2(2)8

Individuals involved in the process have the right to have a support person present at every stage.

O. Reg. 415/06, s. 36.0.2(2)9

The College may implement interim measures to protect individuals during investigations.

O. Reg. 415/06, s. 36.0.2(2)12

The College will establish an appeal/review process relating to investigation decisions.

O. Reg. 415/06, s. 36.0.2(2)13

The College will clearly define the responsibilities of directors, owners, administrators, employees, instructors, agents, contractors, and students.

O. Reg. 415/06, s. 36.0.2(2)14

The College will ensure that students are not asked irrelevant questions, including questions about sexual history or sexual expression.

O. Reg. 415/06, s. 36.0.2(4)3

The College will provide sexual violence prevention training and education to students.

Scope and Application

This policy applies to all members of Freedom College of Business, Healthcare and Technology In.

This policy is applicable to all incidents of sexual violence and harassment that occur within the purview of Freedom College's operations, regardless of location. This includes incidents on campus, during instructional hours, at off-site practicum placements, and any College-affiliated events, whether on or off College premises. The policy also extends to online environments where College-related interactions occur, recognizing the importance of addressing cyber harassment and violence.

3. **Purpose of the Policy**

The purpose of this sexual policy is to:

- Establish clear expectations regarding respectful conduct.
- Define sexual violence and sexual harassment
- Explain reporting and support options.
- Describe investigation and response procedures.
- Ensure compliance with Ontario Legislation
- Protect individuals from retaliation.
- Promote awareness and prevention
- Provide a fair and transparent process for addressing concerns.

This policy applies to all members of Freedom College of Business, Healthcare and Technology Inc community, including:

- Prospective students where applicable
- Director
- Owners and controlling shareholders
- Administrators
- Instructors.
- Employees.
- Contractors.
- Agents
- Volunteers

- Practicum placement partners
- Visitors and guests participating in college-related activities

This policy applies to incidents of sexual violence and sexual harassment that occur:

- On College premises.
- During classroom instruction.
- During Laboratory activities.
- During online learning online activities.
- Through college-related electronic communication platforms.
- During practicum placements.
- During field placements or workplace learning experiences
- During College-sponsored events.
- During activities involving College representatives or community members.

Definition of Sexual Violence

Sexual violence is defined as any sexual act or behavior that targets an individual's sexuality, gender identity, or gender expression, committed, threatened, or attempted without the individual's consent. This includes, but is not limited to:

- **Sexual Assault:** Any form of unwanted sexual contact.
- **Sexual Harassment:** Any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- **Stalking:** Repeated and unwanted attention, harassment, or contact.
- **Indecent Exposure:** Deliberate exposure of one's genitals in a non-consensual context.
- **Voyeurism:** Watching someone in private acts without their consent.
- **Sexual Exploitation:** Taking advantage of another person for sexual purposes.

2. Definition of Sexual Harassment

Sexual harassment is a form of discrimination that can create a hostile, intimidating, or offensive environment, interfering with a person's ability to work, study, or participate in College activities. Examples of sexual harassment include:

- **Quid Pro Quo:** Asking for sexual favors in exchange for academic or employment benefits.
- **Persistent Unwanted Attention:** Repeatedly asking someone out after they have declined.
- **Inappropriate Physical Contact:** Unwanted touching, hugging, or invading personal space.
- **Derogatory Language:** Using gender-based slurs, insults, or stereotypes.

- **Sexual Comments:** Making inappropriate remarks about someone's appearance, clothing, or behavior.
- **Distribution of Explicit Content:** Sharing sexual images or content without consent, including via digital platforms.
- **Sexual Jokes and Remarks:** Making jokes or comments of a sexual nature that create discomfort.
- **Gender-Based Bullying:** Harassing someone based on their gender or non-conformity to gender norms.
- **Cyber Harassment:** Engaging in sexual harassment through online channels or social media.

3. Responsibilities

- **Students, Faculty, and Staff:** All community members are responsible for fostering an environment free from sexual violence and harassment. This includes adhering to this policy, reporting incidents, and participating in awareness and prevention programs.
- **Administration and Leadership:** College leaders, including the Administrator and Director, must ensure a safe environment by setting the tone for appropriate behavior, offering training programs, and responding promptly and effectively to any reports of sexual violence or harassment.
- **Reporting Obligations:** All members of the College community are obligated to report any incidents of sexual violence or harassment they witness or experience. Reports should be made immediately to the Administrator or Director to ensure timely action.
- **Confidentiality and Support:** The College commits to maintaining the confidentiality of reports and providing support to victims, including access to counseling services, academic accommodations, and other necessary resources. Confidentiality will only be breached when there is a clear and imminent risk of harm to the individual or others.

4. Policy Objectives

Freedom College aims to provide a safe and supportive environment where incidents of sexual violence and harassment are addressed with the utmost seriousness. The College will:

- **Dissemination and Education:** Distribute this policy to all Freedom College of Business, Health & Technology Inc. community members such as the college management, instructors, staff, employees, and contractors. Students will be provided with a copy of the Sexual Violence Policy

in all contracts between the college and the students. These individuals will be trained on the policy's procedures for reporting, investigating, and responding to complaints of sexual violence involving students. Companies offering student internships or practicum placement must submit written confirmation that they adhere to all relevant legislation, including the Ontario Human Rights Code and the Occupational Health and Safety Act. These companies must also grant students access to their policies on sexual violence should any issues arise in the workplace.

- **Comprehensive Support:** Offer counseling, medical care, academic accommodation, and other support to victims of sexual violence.
- **Prompt and Fair Investigations:** Ensure that all complaints are investigated thoroughly and fairly, with regular updates provided to both complainants and respondents.
- **Accountability:** Hold individuals accountable for their actions through appropriate disciplinary measures.

5. Investigation of Reports of Sexual Violence

Under this Sexual Violence Policy, any student at
Freedom College of Business, Health & Technology may file a report or complaint of an incident of sexual violence in writing to Marcia Francis. The officials, or departments involved in the investigation will include Luther Francis, Administrator, and Lou dela Cruz, Head Instructor.

Upon receiving a report, the College will:

- **Initial Assessment:** Evaluate whether the incident should be reported to law enforcement immediately and determine any necessary interim measures to ensure safety.
- **Detailed Investigation:** Conduct a thorough investigation involving interviews with all relevant parties, including the complainant, respondent, and witnesses.
- **Support and Communication:** Keep both the complainant and respondent informed throughout the investigation process, offering support and resources as needed.
- **Fair Resolution:** Based on the findings, take appropriate disciplinary action and implement measures to prevent future incidents.

6. Disciplinary Measures

Freedom College will take decisive action against any individual found to have engaged in sexual violence or harassment. Disciplinary measures may include expulsion of students, termination of employment for staff, or other sanctions as appropriate. The College will also cooperate fully with any criminal proceedings and may conduct its independent investigation in parallel.

7. Making False Statements

Filing a false report of sexual violence or harassment is a serious violation of this policy. Individuals who knowingly make false claims may face disciplinary action, including expulsion or termination.

8. Reprisal

The College prohibits retaliation against anyone involved in reporting or investigating sexual violence or harassment. Any form of reprisal will result in disciplinary action, up to and including expulsion or termination.

9. Policy Review

This policy will be reviewed every three years or as required by legislative changes to ensure it remains effective and up to date.

10. Collection of Student Data

Freedom College will collect and maintain data as required under the Ontario Career Colleges Act, 2005, as amended. This data will be made available upon request by the Superintendent of Ontario Career Colleges.

11. Resources

Appendices 1 and 11 provide a list of provincial rape crisis centers and other resources available to students and staff. The College will continuously update and expand these resources to ensure comprehensive support.

Appendix 1

Who to Contact:

1. **Support and Accommodation:**

- If you have experienced or been affected by sexual violence and need support or accommodation, please reach out:
- Students and employees can call **416-398-9231** between 9:00 AM and 5:00 PM, or **416-630-3074** between 6:00 PM and 10:00 PM.
- Alternatively, you can email **info@freedomcolle.ca**.
- To report an incident under this Sexual Violence Policy, you may contact the police or emergency services by dialing **911**. Employees can also contact the administration during business hours.

2. **Rights of Those Affected by Sexual Violence:**

If you have been affected by sexual violence, you have the right to:

- Be believed.
- Be treated with dignity and respect.
- Receive information about available on- and off-campus services and resources.
- Choose whether or not to access available services and select those that you feel will be most beneficial.
- Decide whether to report the incident to Security and/or local police.
- Have an on-campus investigation with the institution's full cooperation.
- Create a safety plan.
- Have reasonable actions taken to prevent further unwanted contact with the alleged perpetrator(s).

3. **Responsibilities:**

    - **Witnesses:** All members of Freedom College who witness sexual violence are obligated to cooperate with any investigation conducted by Freedom College.
    - **Students:** While students are strongly encouraged to report incidents of sexual violence, they are not required to do so to access support or services from Freedom College.
    - **Employees:** All employees are required to report any incidents or suspected incidents of sexual violence to the Administration department immediately.

Filing or Initiating a Complaint:

- You are not obligated to file a formal complaint to receive support, services, or appropriate accommodation from Freedom College.

- Individuals who have experienced sexual violence may also choose to press charges under the Criminal Code. The Administration department can assist in contacting local police.

Appendix 11

Assaulted Women's Helpline
Toll Free: 1-866-863-0511
SAFE (7233) on Bell, Rogers, Fido or TELUS mobile
TTY: 416-364-8762 www.awhl.org

François
Fem 'aide
Telephone toll-free: 1-877-336-2433
ATS: 1 866 860-7082 www.femaide.ca

Sexual Assault/Domestic Violence Treatment Centers
35 hospital-based centers that provide 24/7 emergency care to women. To locate the Sexual Assault/Domestic Violence Treatment Centre nearest you, follow this link.
Local Alliston, Barrie, Collingwood, Midland and Orillia
Huronia Transition Homes operates La Maison Rosewood Shelter (Midland) & Athena's Sexual Assault Counseling and Advocacy Centre 24-hour crisis line:
Barrie: 705-737-2008 or 1-800-987-0799 (South Simcoe Crisis line)
Midland: 705-526-4211 or 1-800-461-1750 (North Simcoe Crisis line)
Office: 705-526-3221 www.huroniatransitionhomes.ca

Belleville
Sexual Assault Centre for Quinte and District
Toll-Free: 1-877-544-6424 Office:
613-967-6300 www.sacqd.com 6

Bracebridge
Muskoka/Parry Sound Sexual Assault Services
Parry Sound District Office
Office: (705) 774-9083 or 1-877-851-6662 www.daphnewymn.com

Muskoka District Office
Office: (705) 646-2122 or 1-877-406-1268
www.daphnewymn.com

Brantford
Sexual Assault Centre of Brantford
Crisis: 519-751-3471 Office: 519-751-1164
sexualassaultcentre@sacbrant.ca
http://sacbrant.ca/

Brockville
Assault Response & Care Centre Office:
(613) 345-3881 or 1-800-567-7415
arcc@bgh-on.ca www.arc-c.ca

Chatham
Chatham-Kent Sexual Assault Crisis Centre
24 Hour Crisis Line: 519-354-8688
Office/TTY: 519-354-8908 http://cksacc.org/

Cornwall
Sexual Assault Support Services for Women
Office: 613-932-1755 http://sassforwomen.ca/
Iethinisten: ha Women's Shelter
Akwasasne Family Violence Program
24 Hour Crisis: 1-800-480-4208 Phone: 613-937-4322 www.akwesasne.ca/iethinistenha-women's-shelter

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

Eganville
Women's Sexual Assault Centre of Renfrew County

24-hour crisis: 1-800-663-30603
Office:613-735-5551; www.wsac.ca

Guelph
Guelph-Wellington Women in Crisis
Crisis: 519-836-5710
1-800-265-7233
Office: 519-823-5806
www.gwwomenincrisis.org

Hamilton
Sexual Assault Centre (Hamilton and Area)
Crisis: (905) 525-4162
Office (905) 525-4573
TTY: 905-525-4592
www.sacha.ca

Kenora
Kenora Sexual Assault Centre 8
Crisis: (807) 468-7233 or 1-800-565-6161 Office:
(807) 468-7958
www.kenorasexualassaultcentre.com

Kingston
Sexual Assault Centre Kingston
Crisis: 613-544-6424 or 1-877-544-6424
Office: 613-545-0762; sack@sackingston.com
www.sackingston.com

Kitchener-Waterloo
Sexual Assault Support Centre of Waterloo Region
Crisis: 519.741.8633
Office: 519-571-0121
info@sascwr.org
www.kwsasc.org

London
Sexual Assault Centre London
Crisis: 519-438-2272
Office 519-439-0844

TTY: 519-439-0690
sacl@sacl.ca;
www.sacl.ca

London Abused Women's Centre
Office: 519-432-2204
E-Mail: info@lawc.on.ca
http://lawc.on.ca/

Peel Region
Hope 24/7 (formerly the Sexual Assault/Rape Crisis Centre of Peel)
Crisis:1-800-810-0180
Office: (905) 792-0821
http://hope247.ca/

New market
Women's Support Network of York Region
Crisis: 1-800-263-6734 or 905-895-6734
Office: (905) 895-3646; www.womenssupportnetwork.ca

North Bay
Amelia Rising Women's Sexual Assault Centre of Nipissing/Centre d'aggressions sexuelles de nippising
Crisis: 705-476-3355
Office: 705-840-2403
TTY: (705) 840-5877
info@ameliarising.ca
www.ameliarising.ca

Oakville
Sexual Assault & Violence Intervention Services of Halton
Crisis: 905-875-1555 or 1-877-268-8416
Office: 905-825-3622 www.savisofhalton.org
Orangeville
Family Transition Place
Crisis: 1-800-265-9178
Office: 519-942-4122
www.familytransitionplace.ca

Ottawa
Sexual Assault Support Centre
Crisis: 613-234-2266
Phone: 613-725-2160
TTY: 613-725-1657
info@sascottawa.com
http://sascottawa.com

Ottawa Rape Crisis Centre
Crisis: 613-562-2333
Office: 613-562-2334
http://orcc.net/

Peterborough & Kawarthas
Kawartha Sexual Assault Centre
Crisis: (705) 741- 0260 or 1-866-298-7778
Office/TTY: (705) 741-0260
www.kawarthasexualassaultcentre.com

YWCA Peterborough Haliburton
Crisis: 1-800-461-7656
Office: 705.743.3526 x 130
www.ywcapeterborough.org

Sault Ste Marie
Women in Crisis (Algoma) Inc. Crisis:
705-759-1230 or 1-877-759-1230
www.womenincrisis.ca

Sarnia-Lambton
Sexual Assault Survivors Centre, Sarnia-Lambton
Crisis: 519 337-3320 or 1-888-231-0536
Office: (519) 337-3154
www.sexualassaultsarnia.on.ca

Simcoe
Haldimand & Norfolk Women's Service
Crisis: 1-800-265-8076

TTY: 1-800-815-6419
Office: 519-426-8048
hnws@hnws.on.ca
www.hnws.on.ca

St. Catherines
Niagara Region Sexual Assault Centre
Crisis: (905) 682-4584
Office: (905) 682-7258
carsa@sexualassaultniagara.org
http://sexualassaultniagara.org/

Thunder Bay
Thunder Bay Sexual Assault and Sexual Abuse Crisis and Counselling Centre
Office: (807) 345-0894 or 1-866-311-5927
tbcounselling@tbsasa.org
www.tbsasa.org

Timmins
Timmins and Area Women in Crisis
Crisis: 1-877-268-8380 (sexual assault)
Crisis: 1-855-827-7233 (shelter)
Office: (705) 268 - 8381
info@tawc.ca
http://www.tawc.ca/

Toronto
Oasis Centre des Femmes
Téléphone : 416-591-6565
Courriel: services@oasisfemmes.org
http://oasisfemmes.org/

Toronto Rape Crisis Centre: Multicultural Women Against Rape
Crisis: 416-597-8808
Office: 416-597-1171
info@trccmwar.ca
crisis@trccmwar.ca
www.trccmwar.ca

Windsor

Sexual Assault Crisis Centre of Essex County
Crisis: 519-253-9667
www.saccwindsor.net

Woodstock
Domestic Abuse Services
Oxford Crisis: 519 539-4811 or 1-800-265-1938 info@daso.ca
www.daso.ca