

SEXUAL VIOLENCE POLICY

Name of Policy: [Sexual Violence Policy](#)

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Position(s) Responsible: Chetna Robinson, Education Delivery, chetna.robinson@lighthouselabs.com

Sexual Violence Policy

In March 2016, Ontario passed legislation which strengthens provisions related to sexual violence and harassment. Lighthouse Labs has adopted this Sexual Violence policy in compliance with Ontario's Bill 132, Sexual Violence and Harassment Action Plan Act, Schedule 5, OCC, 2005, s.32.1, and O. Reg. 415/06, s.36.0 and the [Preventing and Responding to Sexual Violence and Misconduct at BC Post-Secondary Institutions Guide](#) and [Strengthening Post-secondary Institutions and Students Act, 2022, S.O. 2022, c. 22 - Bill 26](#)

Lighthouse Labs is dedicated to providing an educational experience free of sexual violence, and is committed to the prevention of and appropriate response to sexual misconduct. "Sexual violence" is defined as 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. It also includes:

- the distribution of a sexually explicit photograph or video of a person to one or more persons other than the person in the photograph or video without the consent of the person in the photograph or video and with the intent to distress the person in the photograph or video;
- the attempt to commit an act of sexual misconduct; and
- the threat to commit an act of sexual misconduct.

As per The Ontario Career Colleges Act, 2005 amended s. 32.0.1 "sexual misconduct" means, in relation to a student enrolled

(a) physical sexual relations with the student, touching of a sexual nature of the student or behaviour or remarks of a sexual nature toward the student by an employee of the Ontario Career Colleges where,

(i) the act constitutes an offence under the Criminal Code (Canada),

(ii) the act infringes the right of the student under clause 7 (3) (a) of the Human Rights Code to be free from a sexual solicitation or advance, or

(iii) the act constitutes sexual misconduct as defined in the Ontario Career Colleges's employee sexual misconduct policy or contravenes the policy or any other policy, rule or other requirement of

the Ontario Career Colleges respecting sexual relations between employees and students, or

(b) any conduct by an employee of the Ontario Career Colleges that infringes the right of the student under clause 7 (3) (b) of the Human Rights Code to be free from a reprisal or threat of reprisal for the rejection of a sexual solicitation or advance. (“inconduite sexuelle”)

This Sexual Violence Policy outlines Lighthouse Labs’ reporting, investigative and disciplinary responses to complaints and reports of sexual violence made by its students while undergoing their educational program at Lighthouse Labs.

Lighthouse Labs shall provide or make available training on its sexual violence policy to the following persons:

- a. Corporate directors, controlling shareholders, owners, partners and other persons who manage or direct the affairs of Lighthouse Labs, and their agents
- b. Instructors, staff and other employees and contractors of Lighthouse Labs
- c. Students enrolled at Lighthouse Labs

Procedure

A Complaint of sexual misconduct is different from a Report of sexual misconduct. A person may choose to disclose or complain of sexual misconduct without making a formal report. A Report is a formal notification of an incident of sexual misconduct to someone at the institution accompanied by a request for action. A student making a Complaint will be provided with resolution options and, if appropriate, accommodation, and will not be required or pressured to make a Report.

Any processes undertaken pursuant to this policy will be based on the principles of administrative fairness. All parties involved will be treated with dignity and respect. Follows is the process for making a Complaint about sexual misconduct involving a student, and follows are the details of Lighthouse Labs’ process for responding to and addressing incidents and/or complaints and Reports regarding sexual violence.

1. Any student who has been affected by sexual violence or who needs information about support services should contact the Senior Manager of Education Delivery.
2. Within 5 business days, the Program Administrator will notify the Manager of Education Delivery Chetna Robinson, (chetna.robinson@lighthouselabs.com) and Manager, HR Jeremy Shaki (jeremy@lighthouselabs.com) (800) 304-0599 and within 24 hours of being notified a meeting will be arranged with the student who presented the issue to discuss the concern(s), with the option of filling out a sexual violence report.

A student may choose not to request an investigation and has the right not to participate in any investigation that may occur. A student also has the option to fill out a report anonymously.

3. Lighthouse Labs will allow the student to have a person present with them at every stage of the process.
4. Following the meeting with the individual, the Manager of Education Delivery and Manager of HR will work together to:
 - a. Appropriately accommodate the needs of the students and staff affected by the complaint or incident;
 - b. Discuss with the student the supports and services that are available (contacts listed in the 'Sexual Violence Policy Appendix: List of Support Services & Resources').
 - c. Inform the student that a formal report of an incident of sexual violence is not necessary to access supports, services, or accommodations;
 - d. Respect that a student may choose not to request an investigation, and has the right not to participate in any investigation that may occur;
 - e. All information is confidential and will not be shared without the written consent of the parties, subject to the following exceptions:
 - If an individual is at imminent risk of severe or life-threatening self-harm.
 - If an individual is at imminent risk of harming another.
 - There are reasonable grounds to believe that others in the institutional community may be at significant risk of harm
 - reporting is required by law, to initiate an internal investigation and/or inform police without the students' consent, if the institution believes the safety of members of its community or the broader community is at risk.
 - Where it is necessary to ensure procedural fairness in an investigation or other response to a Complaint or Report.
5. To ensure privacy, all complaints, reports and information gathered will be only available to those who need to know for purposes of investigation, implementing safety measures and other circumstances that arise from any given case.
6. After the initial meeting, the Managers will make the decision to conduct whether any further enquiries and/or investigations are necessary.
7. Any necessary inquiries or investigations shall be completed within 5 business days of the initial meeting with the student.

Investigating Complaints and Reports of Sexual Violence

Our process is to ensure that the student bringing the concern forward is heard, supported (by us and outside services if necessary), accommodated, and is given full transparency of the escalation process as it unfolds and a resolution is determined. Our priority is to ensure everyone is treated fairly and respectfully throughout the process.

1. Any student may file a complaint or a report of an incident or complaint to the Program Administrator in person or in writing.
2. The CEO & Partners will be notified about the complaint/report by the Senior Manager/Director of HR.
3. The Manager of Education Delivery and the Manager of HR will arrange to meet with the student to discuss the issue within five business days of receiving the student's written or verbal complaint.
 - a. A student can have a person present with them at all stages of the proceedings.
4. The Manager of HR will determine whether an investigation should proceed and if the student wishes to participate in the investigation.
5. If the Manager of HR determines an investigation is required, they will determine:
 - a) Who should conduct the investigation
 - b) Whether the incident should be immediately referred to the police
 - c) What interim measures should be put into place immediately
6. Once an investigation has started:
 - a. All involved parties will be advised that they may ask another person to be present throughout the investigation
 - b. The student will be interviewed to ensure a complete understanding of the complaint, including any pertinent details that were not included in the initial written complaint.
 - c. The Respondent will be informed of the complaint, given details of the allegations, interviewed, and given an opportunity to respond to the allegations and to provide any witnesses the Respondent feels are essential to the investigation.
 - d. Students who disclose their experience of sexual violence through reporting an incident or, making a complaint about, or accessing supports and services for sexual violence, will not be asked irrelevant questions during the investigation process by the career college's staff or investigators, including irrelevant questions relating to the student's sexual expression or past sexual history

- e. Any other identified person who may have knowledge of the incident or witnesses will be interviewed.
 - f. All involved parties will be provided with updates about the status of the investigation.
7. Upon a further understanding of the situation and after considering all factors, a decision will be made regarding the next warranted course of action. If it is determined that sexual violence has occurred, Lighthouse Labs may immediately take any action they deem appropriate, up to and including:
- a. Termination of contract/employment of instructors or staff
 - b. Suspension or expulsion of student(s)
 - c. Referral to police
 - d. Any other actions that may be appropriate given the circumstances

It is contrary to this policy for an institution to retaliate, engage in reprisals or threaten to retaliate in relation to a Complaint or a Report. **Any form or perceived retaliation from individuals following the resolution of a complaint, regardless of the outcome, will not be tolerated.**

Appeal

1. Any party involved in a sexual violence incident may appeal the decision from the investigation.
2. All appeals must be made in writing to the CEO within 5 business days of receiving the decision, stating their intent to appeal as well as any rationale for an appeal.
3. The CEO will review the intent to appeal and respond within 5 business days outlining the next steps, which could include (but are not limited to), reviewing the information gathered during the investigation and meeting with each of the involved parties.

Collection of Student Data

1. Lighthouse Labs shall collect from its students and other persons, and provide to the Career Colleges Superintendent, the data as required by the Ontario Career Colleges Act.

Policy Review

Lighthouse Labs will review this policy in collaboration with its community, including student input every 3 years. The next review will be January 7, 2025. This institution is certified by the Private Training Institutions Branch (PTIB). Certified institutions must comply with regulatory requirements, including the

requirement to have a Sexual Misconduct policy. For more information about PTIB, go to www.privatetraininginstitutions.gov.bc.ca.

Sexual Violence Policy Appendix: List of Support Services & Resources

City	Organization	Contact
Toronto	<p>Assaulted Women's Helpline</p> <p>A free, 24-hour, 7-day-a-week crisis counselling, emotional support, information and referrals via telephone to individuals (including men) living in Ontario – anonymous and confidential. Services available in up to 200 languages.</p>	<p>GTA 416.863.0511 GTA TTY 416.364.8762 TOLL-FREE 1.866.863.0511 TOLL-FREE TTY 1.866.863.7868 <i>Bell, Rogers, Fido or Telus mobile phone #SAFE (#7233)</i> https://www.awhl.org/home</p>
Toronto	<p>Women's College Hospital Sexual Assault/Domestic Violence Care Centre (SA/DVCC)</p> <p>Acute care for those assaulted within the past week. Centre support available 24 hours a day, seven days a week. Support for cis- women and cis-men as well as trans people who have experienced sexual assault and/or intimate partner violence. You do NOT have to choose to involve police to access this service.</p>	<p>Phone: 416-323-6040</p> <p>https://www.womenscollegehospital.ca/care-programs/sexual-assault-domestic-violence-care-centre/</p>
Vancouver Victoria	<p>VictimLink BC</p> <p>A toll-free 24/7 information and support line that provides information and referrals to all victims of crime, and crisis support to victims of family and sexual violence, including sexual assault, violence in relationships, elder abuse, and adult survivors of physical or sexual abuse. VictimLink BC provides service in up to 150 languages, including many North American Aboriginal languages.</p>	<p>Phone: 1-800-563-0808</p> <p>24 hours every day</p> <p>or sending an email to VictimLinkBC@bc211.ca</p> <p>https://www2.gov.bc.ca/gov/content/justice/criminal-justice/victims-of-crime/victimlinkbc</p>
Vancouver	<p>Sexual Assault Service</p> <p>We provide care to anyone from any province or country. When you arrive at the emergency department ask for the Sexual Assault Service. All services are free and confidential.</p>	<p>Go to Vancouver General Hospital's Emergency Department (24 hours) 920 West 10th Avenue OR UBC Hospital's Urgent Care Centre Koerner Pavilion, 2211 Wesbrook</p>

	No Carecard (MSP) is needed.	Mall. 8:00am-10:00pm Our team is on-call 24/7 every day http://www.bcwomens.ca/our-services/specialized-services/sexual-assault-service
Calgary	Connect Family & Sexual Abuse Network One phone call connects you to Calgary's network of services and support. Provides access to comprehensive services and support for those impacted by domestic violence, sexual violence and sexual abuse.	24-hour crisis line: 403-237-5888 toll-free 1-877-237-5888 Sheldon Chumir Urgent Care Centre 1213 - 4 Street SW, Calgary http://www.connectnetwork.ca/
Calgary	Sexual Assault Response Team (SART) This crisis response team provides specialized care to individuals who have been sexually assaulted within the past 96 hours. The service is available through any Calgary emergency department or urgent care centre, and the team works primarily out of their specialized facilities in the Sheldon Chumir Urgent Care facility.	403-237-5888 The SART team is available 24 hours at the Sheldon Chumir Hospital 1213 4 St SW, Calgary https://calgarycasa.com/support-services/sexual-assault-response-team/
Montreal	Montreal Sexual Assault Centre/Centre pour les victimes d'agression sexuelle de Montréal Bilingual services. Specially trained caregivers will receive your call, listen to you, determine your needs and help you to decide what to do next.	Montreal 514 933 9007 24 hours Toll-free provincial helpline 1-888-933-9007 https://www.cvasm.org/en/ https://www.cvasm.org/
Montreal	CLSC Metro and the Montreal General Hospital French and English. CLSC Métro and the Montreal General Hospital, is a designated centre in Montreal. if you wish to receive a medical assessment, you must visit the RVSQ website or call Info-Santé at 811 24 hours a day, 7 days a week offering confidential services to victims of sexual assault	Monday to Friday: 8 a.m. - 5 p.m. CLSC Métro 1801 Maisonneuve Blvd. West Montréal, Québec H3H 1J9 514-934-0354 https://www.ciusswestcentral.ca/sites-and-resources/clsc/clsc-metro/
Ottawa	The Sexual Assault Support Center of Ottawa	24 hours Support Line:

	<p>We support all womyn: immigrant, indigenous, LGBTQ+, diversely abled, womyn of colour, trans womyn, survivors of war & torture.</p>	<p>613-234-2266 P.O. Box 4441, Stn. 'E' Ottawa, ON. K1S 5B4</p> <p>Office Line: 613-725-2160 Fax: 613-725-9259 TTY: 613-725-1657 Email: info@sascottawa.com Facebook: Sexual Assault Support Centre of Ottawa Twitter: Sascottawa Instagram: @sascottawa https://sascottawa.com/</p>
<p>Ottawa</p>	<p>Ottawa Rape Crisis Centre Support, information, and long term counselling services to women survivors of sexual assault, sexual harassment and childhood sexual abuse, including accompaniment to court, hospital or police.</p>	<p>Crisis phone 613-562-2333 * when leaving a message, confirm if you wish to be called back</p> <p>Email: orcc@orcc.net Office Phone: 613-562-2334</p> <p>PO Box 20206 Ottawa, ON K1N 9P4 https://orcc.net/</p>