



PROCEDURE: RESPONSE TO HARASSMENT OF STAFF BY CLIENTS

This procedure has been developed in accordance with the Coast Funds policy on anti-harassment contained in Coast Funds Employee Handbook (the “Handbook”), dated October 18, 2017.

This procedure deals specifically with harassment of Coast Funds employees by clients.

POLICY

Coast Funds is committed to providing a positive working environment that is free from all types of harassment. As such we operate a **zero tolerance** policy towards harassment and any disregard for Coast Funds anti-harassment policy will not be tolerated.

DEFINITIONS

Harassment is a form of discrimination; it is any unwelcome conduct or comment based on race, color, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, gender, sexual orientation, age or unrelated criminal conviction that may detrimentally affect the work environment or lead to adverse job-related consequences for the victim of the harassment. Harassment can also be personal.

Personal harassment is harassment not rooted in one of the above listed groups of characteristics. It includes objectionable conduct or comments, deliberate gestures, questions, representations or other behaviours directed towards a specific person or persons which are uninvited or unwelcome and ought reasonably to be known to be unwelcome. These behaviours serve no legitimate work purpose and have the effect of creating an intimidating, humiliating, hostile or poisoned work environment.

Sexual harassment is a form of discrimination; it is any unwelcome conduct or comments of a sexual nature that may detrimentally affect the work environment or lead to adverse job-related consequences for the victim of the harassment.

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Background: Process if clients dissatisfied by PRC or board decision

- On occasion Coast Funds clients may feel dissatisfied with decisions made by the PRC or board, or with the application process.
- If clients feel that a decision has been made in error or otherwise not in accordance with Coast Funds governing documents, policies, or procedures, they will be encouraged to set out the reasons for their dissatisfaction in a letter to Coast Funds staff.
- Staff will respond in writing to the letter as soon as possible.



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- If staff consider the issue should be brought to the PRC or board for further consideration before responding, they endeavor to do so promptly and let the client know that the matter is under further consideration and a response will be provided as soon as possible.
- This procedure will be communicated to Coast Funds clients when acknowledging receipt of applications and again when the outcomes of application decisions are communicated to them.

Awareness of procedure

- Coast Funds clients are made aware of and reminded as appropriate on a regular basis about this policy and the correct procedure for making complaints about funding decisions.

Procedure if employees are harassed by clients

- In the event that a Coast Funds employee is subjected to harassment by an employee, official or other representative of a Coast Funds client for any reason (including dissatisfaction with a Coast Funds application decision) the following steps are taken:
 - Immediately respectfully request the individual to stop the harassing behavior, explaining that while it is Coast Funds policy to provide support to Coast Funds clients that does not require staff to tolerate abusive or harassing behavior, and (if applicable) remind the individual of the correct procedure for making a complaint about a funding decision;
 - If the individual fails to stop immediately, explain to them that communication with that individual will cease until and unless they commit to refrain from harassing or abusive behavior;
 - If the behavior still does not cease, terminate the communication and report the incident immediately to the CEO;
 - If the harassment is of the CEO, he or she will report the incident immediately to the Chair of the PRC.
- The CEO (or the Chair of PRC as the case may be) contacts the client to remind them of this policy and the correct procedure for complaints about funding decisions, and requests that the individual concerned refrain from further harassment of Coast Funds staff.
- Employees are not required to communicate directly with any individual who does not commit to refraining from further harassing or abusive behavior.