

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

## **1.0 Purpose**

### **1.1 Sexual violence is unacceptable and will not be supported nor tolerated at Global Flight Training Solutions.**

1.1 All individuals at Global Flight Training Solutions have the right to work and learn in a safe environment that is free of sexual violence. The Ontario Government together with postsecondary institutions works to provide an environment to help students learn, study, and experience campus life at its finest, free from sexual violence and harassment.

1.2 Global Flight Training Solutions has adopted the following sexual violence policy to ensure a safe environment free from sexual violence.

1.3 Global Flight Training Solutions policy outlines the college's reporting, investigating and disciplinary responses which will be taken if complaints of sexual violence have been made by a student on campus, at a Global Flight Training event or within the aviation training environment.

1.4 Sexual Violence, sexual harassment, indecent exposure, and sexual exploitation are Criminal Acts, governed by the Criminal Code of Canada.

1.5 Employees, Contractors, Third Source Parties, Students, Management, Executives, and all others associated with Global Flight Training Solutions, are bound by the Criminal Code of Canada which states:

**271** Everyone who commits a sexual assault is guilty of

- **(a)** an indictable offence and is liable to imprisonment for a term of not more than 10 years or, if the complainant is under the age of 16 years, to imprisonment for a term of not more than 14 years and to a minimum punishment of imprisonment for a term of one year; or

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

- **(b)** an offence punishable on summary conviction and is liable to imprisonment for a term of not more than 18 months or, if the complainant is under the age of 16 years, to imprisonment for a term of not more than two years less a day and to a minimum punishment of imprisonment for a term of six months.
- R.S., 1985, c. C-46, s. 271, R.S., 1985, c. 19 (3rd Supp.), s. 10, 1994, c. 44, s. 19, 2012, c. 1, s. 25, 2015, c. 23, s. 14

**1.6** Global Flight Training Solutions will continually develop and improve upon training and information sources to aid GFTS personal in understanding and identifying Sexual Violence and actions that can be taken to alleviate this violence, identify practices that may directly or indirectly attribute to Sexual Violence, misconceptions surrounding Sexual Violence and actions to be deployed if we receive reports of any form of Sexual Violence.

## **2. Definitions**

**2.1 Sexual Violence** – Sexual violence means 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 but **is** not limited to: sexual assault; sexual harassment; indecent exposure and sexual exploitation.

**2.2 Consent** - Consent is defined as the voluntary agreement of the person to engage in the sexual activity in question. Consent is not obtained if the person is incapable of consenting to the activity, the accused tries to coerce the person into engaging in the activity by abusing a position of trust, power or authority, or the person has shown a lack of agreement to the accused by words or conduct. The aforementioned ways in which consent is not given are not the only examples; there are other means or circumstances in which consent is defined as not given.

**2.3 Sexual Assault** - is any assault of a sexual nature that violates a person’s sexual integrity

**2.4 Sexual Harassment** - Sexual harassment might include unwelcomed sexual advances or requests for sexual favors. Direct or indirect threats or bribes for sexual activity may be sexual harassment. In some contexts, sexual jokes or innuendoes are identified as sexual harassment. Unwelcomed touching or rubbing up against a person, or the attempt of sexual assault is considered sexual harassment.

Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**2.5 Indecent Exposure** - indecent exposure is defined as the intentional exposure of part of one's body (such as the genitals) in a place where such exposure is unacceptable, like, but not limited to, the workplace or school.

**2.6 Sexual Exploitation** - any person who commits an offence who is in a position of trust or authority towards another person who for a sexual purpose, touches, directly or indirectly, with a part of their body or with the use of an object.

### **3. Training, Reporting and Responding to Sexual Violence**

**3.1** Global Flight Training Solutions will include a copy of the Sexual Violence Policy in every contract made between it and its students and provide a copy of the Sexual Violence Policy to career college management, instructors and staff and ensure they are educated on and are aware of the process and policy of identifying and reporting complaints of sexual violence made by students.

**3.2** The Sexual Violence Policy is published on Global Flight Training Solutions website GFTS.CA and on the campus bulletin board.

**3.3** Global Flight Training Solutions management, instructors and staff, and other employees will report incidents or complaints of sexual violence to the Campus Administrator at [campusadmin@gfts.ca](mailto:campusadmin@gfts.ca) upon becoming aware of them.

**3.4** Global Flight Training Solutions will keep all personal information of individuals involved in the investigation confidential, except in circumstances where it is believed that the individual is at immediate risk, either of self-harm or of harming others; this will be done by:

**a)** Ensuring that all complaints/reports and information gathered will be only available to those who need to know for purposes of, but not limited to, investigation and outlining safety measures;

**b)** Ensuring that the documentation is kept in a separate file;

**3.5** Global Flight Training Solutions recognizes that a person has a right to not report an incident of sexual violence; however, the college may be required by law to initiate an investigation without consent if the safety of the students on campus or within the community is at risk. The individual will also be made aware that they have the right to not participate in any investigation that may occur.

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**3.6** If students, in good faith, report an incident of, or make a complaint about, sexual violence, they will not be subject to discipline or sanctions for violations of Global Flight Training Solutions Policies or any other policies or regulations of Transport Canada, such as being intoxicated, alcohol and / or drugs, while being a crew member of a flight.

**3.7** Students who disclose their experience of sexual violence through reporting of an incident, making a complaint about, or accessing supports and services for sexual violence, will not be asked irrelevant questions during the investigation process such as, questions relating to the student's sexual expression or past sexual history.

**3.8** Global Flight Training Solutions will assist students who have experienced sexual violence in obtaining counseling, medical care, and provide support services available within the community as identified in but not limited to Appendix A attached.

**3.9** The complainant will utilize the Student Complaint Form to initialize the reporting of a Sexual Violence occurrence. Due to the nature of the report the report shall be directed to the Campus Administrator.

**3.10** There will be no reprisal for submission of the report. Reprisal is any harassment, intimidation, demotion, denial of grading, denial of recommendation for flight training advancement, termination of employment, termination of enrollment to a member in abstaining from filing a complaint.

Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**4. Investigating Reports of Sexual Violence**

**4.1** Under this Sexual Violence Policy, any student of Global Flight Training Solutions may file a report of an incident or a complaint to College Administrator at campusadmin@gfts.ca in writing and / or utilizing the Student Complaint Form.

**a)** In the event that the complaint is being made against the Campus Administrator, the Campus Administrator will not be involved in the investigative process and the report will be submitted to a Global Flight Training Solutions Director.

**4.2** Once a complaint of sexual violence is made, the individual who received the complaint will notify the Campus Administrator who will.

**a)** Determine whether an investigation is necessary and if the complainant wishes to participate in said investigation.

**b)** Determine who should conduct the investigation, depending on the severity of the allegation

**c)** Finally, determine whether the incident should be referred to the police.

**d)** In cases where civil proceedings are ongoing, Global Flight Training Solutions may conduct its own investigation to:

**i)** Determine what measures are to be taken during the investigation process, like removing the Accused or any other appropriate measures.

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**4.3** Once an investigation is initiated, the following will occur:

- a)** The Complainant and the Accused may ask another individual to be present throughout the investigation; this individual will be able to participate with and or on behalf of the requesting party.
- b)** Inform and interview the complainant to fully understand the allegation and inquire about information that may not have been included in the written complaint.
- c)** Inform and interview the person accused to discuss details of the incident and give the accused an opportunity to respond to said allegation and provide any witnesses or further information on the matter.
- d)** Interview any person(s) involved who may have knowledge of the incident
- e)** Provide updates to both the Complainant and the Accused on the status of the investigation;

**4.4** Following the investigation, the Global Flight Training Solutions will:

- a)** Review all of the evidence collected during the investigation;
- b)** Then, determine whether or not an act of sexual violence occurred; in the event that sexual violence is proven, the college will then
  - i)** Determine what disciplinary action, if any, should be taken. These actions are outlined in Section 5 below.

Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**5. Disciplinary Measures**

**5.1** If it is determined by Global Flight Training Solutions that the accused engaged in any form of sexual violence, immediate disciplinary or corrective action will be taken, which may include

- a)** The termination of employment of instructors or staff; or
- b)** The expulsion of a student; and/or
- c)** Any other actions that may be appropriate in the circumstances which will include notification of local police authorities

Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

## **6. Appeal**

**6.1** If the Complainant or the Accused is not satisfied with the decision, he or she may appeal the decision to an appeals board composed of three (3) members: two (2) of whom will be appointed by the Campus Administrator and one selected by the Complainant or Accused. If the incident involves the Campus Administrator, the two (2) members will be selected by a Global Flighty Training Solutions Director.

**6.2** Any such appeal must be made within thirty (30) days. A request to be heard before the Appeal Board must be in writing to the Campus Administrator explicitly explaining the basis of the appeal. The appeal will be held within two (2) weeks of the Appeal Board receiving the request. The Appeal Board will then make their decision within seven (7) days of the hearing.

**6.3** If not satisfied with the decision of the appeal board, a written appeal may be sent to the Board of Directors of Canadian Aviation Maintenance Inc. This next step is only to be done if the complainant or the accused are alleging improper procedure or feelings of prejudice by the Appeal Board.

**6.4** Following the above procedures, any unresolved dispute or claim (including physical or personal injury, mental anguish, etc., of any kind) by or between a student and Global Flight Training Solutions (or any of the College Employees, directors, instructors or staff) may be resolved by providing an arbitrator who is mutually decided by both the student and the college. If this claim comes to arbitration, the student is responsible for paying 100% of the arbitrator's fees, unless otherwise recommended by the arbitrator.

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**7. Making False Statements**

**7.1** It is a violation of this Sexual Violence Policy for anyone to knowingly make a false complaint of sexual violence or to provide false information about a complaint; in the event an employee, instructor or student has violated such policy, he/she will be fired or expelled.

**8. Reprisal**

**8.1** Retaliating or threatening person(s) bringing forward a claim of sexual violence, or someone providing information on an investigation or to anyone else involved is a direct violation of the Sexual Violence Policy; in the event an employee, instructor or student has violated such policy, he/she will be fired or expelled.

**9. Review**

**9.1** Global Flight Training Solutions will ensure that student input is taken into consideration when developing, reviewing and/or amending the Sexual Violence Policy which will be reviewed minimally; at least three years after implementation.

Department:	Administrative
Policy ID Number:	OCC 1000-2
Effective Date:	20251120
Approved By:	President
Revision Status:	Revision 1
Review Date:	20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

## **10. Harassment**

**10.1** Global Flight Training Solutions policy on harassment mirrors that of **its** sexual violence policy. The same reporting, investigating, discipline and appeal processes will be followed in the event of a harassment claim being reported.

## **11. Collection of Student Data**

**11.1** Global Flight Training Solutions will collect and be prepared to provide upon request by the Superintendent of Ontario Career Colleges such data and information as required according to Subsections 32.3 (8), (9) and (10) of Schedule 5 of the Ontario Career Colleges Act of 2005 as amended.

## **12. Amendment Procedure**

**12.1** Global Flight Training Solutions will file a copy of any changes to the procedure with the Superintendent. No change to Global Flight Training Solutions Sexual Violence and Harassment Policy shall take effect prior to approval by the Superintendent.

**12.2** The changes shall be highlighted and submitted to the Superintendent.

**12.3** Once approved, the Amendment will be inserted into the Policy.

**12.4** The Campus Administrator will then enter the revision into the Revision Log.

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**13.0 Revision Log**

Date	Summary of Changes	Revision No

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222

TITLE: SEXUAL VIOLENCE AND HARASSMENT POLICY

**Appendix A:**

Sexual Assault Centre Kingston (24hrs/day crisis line) – 613-544-6424 / 1-877-544-6424: [webelievesurvivors.ca](http://webelievesurvivors.ca)

If you are a victim of sexual assault or domestic violence, go to your nearest Emergency Department and ask to see the Sexual Assault/Domestic Violence (SADV) nurse. The SADV team is available 24 -hours-a-day, seven days a week.

If you choose to report – Kingston Police – 613-549-4660

For more information about sexual violence policies at Ontario career colleges, please refer to Fact Sheet 12: Action Plan to Stop Sexual Violence and Harassment. Ontario career college students' rights and responsibilities | [ontario.ca](http://ontario.ca)

Department: Administrative  
Policy ID Number: OCC 1000-2  
Effective Date: 20251120  
Approved By: President  
Revision Status: Revision 1  
Review Date: 20260222