



Northern Ontario  
School of Medicine  
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du Nord de l'Ontario  
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## Procedure

Responding to Resident Concerns of Mistreatment		Class: B			
<b>Approved By:</b>	Postgraduate Education Committee (PGEC)				
<b>Approval Date:</b>	2021 09 02	<b>Effective Date:</b>	2021 09 02	<b>Review Date:</b>	2023 02 13
<b>Responsible Portfolio/Unit/Committee:</b>	Postgraduate Medical Education (PGME)				
<b>Responsible Officer(s):</b>	Associate Dean, PGME				

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## 1.0 Purpose

The Northern Ontario School of Medicine (NOSM) is committed to excellence in teaching, learning, and research and to the maintenance of a learning and work environment, which promotes the understanding, respect for dignity and diversity of all persons as part of the NOSM community.

The goal of this Procedure is to create a climate of understanding and mutual respect in the Postgraduate Medical Education (PGME) program where every learner feels part of the NOSM community and can contribute fully to the development and well-being of NOSM. NOSM does not tolerate discrimination and harassment, which includes behaviours related to intimidation, bullying and other disrespectful conduct. When a concern regarding a breach of this Procedure is raised, NOSM will attempt to respond promptly and will strive to achieve a fair and timely resolution.

In seeking to ensure that PGME residents can learn and work in an environment free from discrimination, harassment and reprisal, this Procedure is guided by the *Ontario Human Rights Code*, the *Occupational Health and Safety Act*, and the Canadian Standard on Psychological Health & Safety, as well other relevant legislation, policies and collective agreements.

This Procedure is to be used in conjunction with [NOSM's Policy and Procedure on Human Rights, Anti-Discrimination and Harassment](#). All rights and responsibilities articulated in NOSM's Human Rights Policy apply along with this Procedure and nothing in this Procedure derogates from the duties, protections and process established in the Human Rights Policy.

## 2.0 Scope

This Procedure applies to all members of the PGME program, including learners, visiting learners, faculty, visiting scholars, stipendiary faculty, staff, healthcare professionals and patients.

Mistreatment in healthcare and educational environments is unprofessional and disrespectful behaviour that is not tolerated by NOSM. This Procedure applies to all NOSM-PGME related activities, both authorized and non-authorized interactions that occur on NOSM premises or on non-NOSM premises, which arise out of the individual's NOSM related role, including social events and social media communications where there is a connection between the individual's actions to NOSM work or learning environment.

- 2.1 In certain circumstances, more than one policy or code may apply, or may be relevant to the process outlined herein. When policies or codes of other partner institutions/agencies may also apply in tandem with this Procedure, consultations may be undertaken by NOSM

with the Administrator of the other policy or code at the partner institution/agency before formal proceedings under this Procedure are initiated.

Any complaints made regarding NOSM employees who are members of a Union shall proceed in a manner consistent with the appropriate Collective Agreement. In cases where this Procedure is not consistent with the Collective Agreement, the Collective Agreement will be followed.

### **3.0 Important Principles**

- 3.1 **Definitions:** Definitions for Discrimination, Harassment, Sexual or Gender-based Harassment, Personal (non-Code based) Harassment, Intimidation and Reprisal are detailed in NOSM's Human Rights Policy, attached as Appendix A.
- 3.2 **Confidentiality:** The aim of this Procedure is to promote timely resolution of PGME resident issues. Any information, concerns or complaints brought forward under this Procedure will be treated confidentially, subject to disclosure obligations set out in the Human Rights Policy. NOSM will endeavour to ensure that information will only be shared on a 'need to know' basis to ensure compliance with this Procedure and the Human Rights Policy.
- 3.3 Protecting confidentiality with respect to all matters related to this Procedure is in the interests of affected individuals and the NOSM community. Confidentiality is critical to ensure a fair process, protect against reprisal, preserve a respectful environment and uphold the dignity of all involved in the complaint process. All participants to a complaint under this Procedure, including residents, responding persons, supervisors, staff, witnesses and administrators, must refrain from discussing the concerns, allegations and/or the steps involved with others extraneous to the complaints process. All participants must keep the content of the complaint, response, investigation, evidence, findings and outcome, in strict confidence. In case of any intentional or reckless breach of confidentiality, the individual responsible for the disclosure may be subject to sanctions.
- 3.4 **Interim Measures:** In certain circumstances, it may be necessary for PGME program to institute interim measures in order to protect the Parties, promote a healthy environment, facilitate an Investigation and safeguard various interests. Interim steps that could be considered for implementation during the complaint process may include limiting contact between Parties and/or temporarily relocating or reassigning a Party pending the outcome of the process. Any steps taken should not penalize the Parties or put them at a disadvantage for participating in the process. In the event of safety concerns, the PGME program will seek the appropriate advice and take all necessary action.
- 3.5 **Protection Against Reprisal:** NOSM specifically prohibits reprisal or threats of reprisal against any individual who sincerely and in good faith makes use of this Procedure or participates in any process held under its jurisdiction. No person shall be subjected to negative treatment for raising anti-discrimination and harassment concerns or bringing forward a formal complaint, providing information related to a complaint, or participating in an Investigation under this Procedure or the Human Rights Policy. All Parties, witnesses,

advisors, Investigators, and Policy administrators are protected from reprisal. Any individual who believes they are subject of a reprisal or threat of reprisal shall report this to NOSM Human Resources. Any individual or entity found to be engaging in reprisal will be subject to sanctions under the Human Rights Policy of the same consequences as complaints of discrimination and harassment.

- 3.6 The PGME program will make all best efforts to minimize the risk of reprisal against residents who use this Procedure, including if there are no findings of wrongdoing. Examples of possible measures to minimize reprisal are: having the resident's performance assessed by an alternate faculty member, facilitating having another faculty provide a letter of reference for the resident; and advocating for the resident regarding any potential conflict-of-interest that may occur.
- 3.7 **Accommodation:** The PGME Program respects and upholds its obligation to provide reasonable accommodation to residents. If the resident's concerns relate to accommodation needs, the resident should raise these concerns with a PGME Leader as outlined in the [PGME Accommodations Policy](#).

#### 4.0 Procedures

- 4.1 There are a variety of avenues set out in this Procedure and the Human Rights Policy for residents to informally or formally raise concerns of mistreatment. In normal circumstances, it is expected that a resident will raise their concerns of mistreatment within one (1) year of the date of the last alleged incident.

#### 4.2 Option One – Individual Resolution of a Concern

As an initial step, the informal resolution of concerns is supported and encouraged by the PGME program. In many cases, a conversation with the other person(s) is the most effective way to resolve a concern. Where there is opportunity for safe, respectful and collegial discussion, the resident is encouraged to speak directly to the other person(s) to let them know that something has happened that is uncomfortable for them or that the person's behaviour is unwelcome and ask them to stop the behaviour.

If the resident is not able or not comfortable to speak directly to the person, or at any time in the process, the resident may consult with the Resident Wellness Program or a NOSM Learning Advocate or Residency Program Ombudsperson if applicable, for advice, support and guidance about their concerns. Various options may be canvassed.

One option may involve the Resident Wellness Program or Learning Advocate communicating with the other person(s) on the resident's behalf or facilitating a meeting between the resident and the other person(s). No contact with the other person(s) will occur without the consent of the resident. Exceptions to the general principle of confidentiality may be made in the event of suspected imminent danger, health or safety considerations, seriousness of the issue, or where required by law.

In some situations, the resident may consult with a support person and come to an understanding that the behaviour was not mistreatment. Resources and supports available to NOSM residents are outlined in Section 5 of this procedure.

### 4.3 **Option Two – Informal Resolution of Concern Through a PGME Leader**

If a resident does not wish to approach the person, have the Resident Wellness Program or Learning Advocate speak with the other person, or if the concerning behaviour continues, the resident should contact either their Site Director, Program Director or any representative of the PGME Office (PGME Education Manager, PGME Senior Director or PGME Associate Dean) to discuss the issue and initiate either an informal or formal resolution. If a resident is unsure of whom to contact, the resident may contact the Resident Wellness Program or a Learner Affairs Officer supporting PGME.

Once contact is made the program leader or resident wellness program will connect the resident with a Learner Affairs Officer to provide support and to provide them with a copy of this Procedure and NOSM's Human Rights, Anti-Discrimination, Harassment Policy. At this juncture, the resident will complete the online Learning and Teaching Environment Event Disclosure Form with the support of the LAO. A resident may also directly undertake the steps to submit the online form to start the reporting process and will be contacted by a Learner Affairs Officer to support the follow up.

- 4.4 If the resident wishes to proceed with a complaint, the Program Director of the resident's program will be notified by the PGME Office about the resident's concerns. Alternatively, if the subject of the complaint is the Program Director, then PGME Associate Dean will be involved. If the subject of the complaint is the PGME Associate Dean or PGME Senior Director, then NOSM's Human Resources will be notified for follow up.
- 4.5 At any time, residents may contact PARO in addition to the LAO for guidance with this reporting procedure. Residents are welcome to involve the PARO Office directly at any stage of the process and PARO can attend to support residents if requested (i.e., to take notes) although PARO can not speak on behalf of the resident nor represent them. The Program Director and or PGME Associate Dean may also ask for an administrator to be present during any related meetings. The LAO will remain in contact with the resident providing support and bi-weekly updates on the status of the complaint.
- 4.6 The Program Director will confirm in writing that the resident wishes to resolve the concerns on an informal basis. Depending upon that nature of the complaint and the role of the individuals involved, the Program Director will advise the PGME Associate Dean, contact the person(s) involved in the concern, and may involve the supports of the NOSM Faculty Affairs, affiliated teaching hospital administration, other NOSM academic program leadership, and/or NOSM Human Resources. They will work with those involved to resolve informally the issues between the resident and the other person.
- 4.7 If the affected individuals (resident and responding person) agree, the Program Director and PGME Associate Dean may recommend an informal resolution process, which, if

successful, resolves the concern in a timely and fair manner. This informal resolution process may include one or more of the following:

- a) meeting(s) involving the resident and the other person(s) with the Program Director or PGME Associate Dean for informal mediation through facilitated discussions for the purposes of resolution,
  - b) arrangements made by the Program Director or PGME Associate Dean for another person to be a mediator to formally assist in achieving a resolution, or
  - c) other actions suggested by the Program Director or PGME Associate Dean that are agreed to by the resident and the other involved person(s).
- 4.8 The Program Director or designate will prepare a written summary of the concern and its resolution and submit it to the PGME Associate Dean and the Director of Learner Support Services. Summary correspondence pertaining to the resolution will be housed in confidential resident files maintained by the PGME Office. As an informal resolution, the persons involved will not be identified.

4.9 **Option Three – Formal Written Complaint and Investigation**

At any time in the process or if the concerns are not resolved informally, the resident may opt to submit a formal written and signed complaint to the PGME Associate Dean using the Learning and Teaching Environment Event Disclosure Form. A resident may exercise the option of a formal complaint as a first step should they chose not to participate in an informal resolution process.

The complaint will be received by the Office of the Associate Dean of PGME and Health Sciences and the LAO will be notified to support the student. If the complaint is about the Associate Dean, Senior Director, PGME & HS or Executive Assistant, PGME & HS, the complainant is advised to contact NOSM Human Resources and PARO for an independent official to serve as the designate individual responsible for overseeing the complaint process.

- 4.10 On receipt of the event form and confirmation that the learner wishes to proceed with a formal stage three complaint and investigation, the LOA will work with the resident to finalize a statement of facts that is signed by the resident. The statement of facts is forwarded to the Associate Dean and Senior Director, PGME & HS who will:
- a) Within ten (10) business days of receipt of the resident's written complaint meet with the resident to clarify the details of the complaint and determine who will lead the investigation (NOSM or Hospital/Clinical site depending on circumstances) while the LAO provides bi-weekly updates and support to the student on the progress of the investigation
  - b) Within ten (10) business days of a), advise the resident of the next steps for pursuing the complaint in accordance with NOSM's Human Rights Policy;

- c) Within ten (10) business days of b) inform the respondent(s) in writing of the complaint. The PGME Associate Dean/Senior Director or Designate will provide a copy of the written complaint, NOSM's Human Rights Policy and this Procedure to the respondent(s). The support of Human Resources may be sought by the PGME Associate Dean or Designate to ensure appropriate contact is made with respondents and unions;
  - d) the respondent(s) will be directed to provide a written response to the complaint within ten (10) business days to the PGME Associate Dean/Senior Director or Designate;
  - e) Within ten (10) business days of receipt of the written response pursuant to d), the PGME Associate Dean/Senior Director or Designate may meet with the respondent to clarify the details of their response;
  - f) Within ten (10) business of e) and receipt of all submissions and clarifications, the PGME Associate Dean/Senior Director or Designate will consult with NOSM's Director of Learner Support Services to identify the steps to be taken to address the complaint which may include mediation or the appointment of a qualified external Investigator; and
  - g) Steps to resolve matters that are referred to formal mediation or third-party Investigation are found in NOSM's Human Rights Policy at Section 6.3 Stage 3 & 4. Parties are directed to reference NOSM's Human Rights Policy for all overarching rights and responsibilities with respect to the formal complaint process, including confidentiality, interim measures, overlapping jurisdiction, role of the Investigator, participation in the Investigation, and decision-making powers.
- 4.11 The resident, supported by an LAO or PARO or alternate support person, will meet with PGME Associate Dean/Senior Director or Designate for a summary of the resolution/conclusion of the formal Investigation of the complaint.
- 4.12 Whenever possible, the resident and respondent will be invited to a joint meeting with the PGME Associate Dean and PGME Senior Director and other relevant parties in support of the respondent to discuss the actions associated with the resolution of the complaint.
- 4.13 A final summary of the complaint will be submitted by the PGME Associate Dean to the NOSM's Interim Director of Learner Support Services. Confidential files of formal complaints will be housed by the NOSM Human Resources department.
- 4.14 All residents submitting complaints will be given updates from the assigned Learner Affairs Officer.

### **5.0 Resources**

- 5.1 Resources with links and contact information are available to PGME Residents on the NOSMWell app and include groups such as:
- a) NOSM Resident Wellness Program <https://www.nosm.ca/residency-programs/resident-wellness>

b) Morneau Shepell Employee & Family Assistance Program:

<https://www.shepell.com/en-ca/totalhealthsolutions/yourefap/>

c) OMA Physician Health Program: <https://www.physicianhealth.com/>

d) PARO:

PARO can provide support to residents experiencing challenges related to academics, wellness, contract, and non-contract employment issues. Phone: 416-979-1182 Toll Free: 1-877-979-1183 Fax: 416-595-9778

Email: [paro@paroteam.ca](mailto:paro@paroteam.ca)<https://myparo.ca/about/>

24 Hour confidential Helpline available to residents, their partners and family members, as well as medical students. The toll-free number, 1-866-HELP-DOC (1-866-435-7362), is accessible anywhere in Ontario, 24 hours a day, 7 days a week. In order to provide this service, PARO has partnered with Distress Centres of Toronto.

<https://myparo.ca/helpline/>"<https://myparo.ca/helpline/>

e) NOSM residents and their dependent family members (e.g. spouse and dependent children) can access Shepell's bilingual short-term professional assessment, counselling, consultation, resource referral and case-management program by calling 1-800-387-4765 (for service in English) or 1-800-361-5676 (for service in French).

f) Additional support information is available at <https://www.nosm.ca/education/md-program/for-current-learners/learner-services/>

## 6.0 Related Documents

In support of this policy, the following related policies are included:

- [NOSM Human Rights and Anti-Discrimination & Harassment Policy](#)
- [PGME Accommodations Policy](#)

## 7.0 Getting Help

Queries regarding interpretations of this document should be directed to:

- PGME Wellness Lead Clinician
- Senior Director, PGME
- Interim Director, Learner Support Services

Version	Date	Authors/Comments
2.0	2021 09 02	Approved by NOSM Postgraduate Education Committee.





## **Appendix A**

### **Definitions (cited from NOSM's Human Rights and Anti-Discrimination Harassment Policy prepared for Board of Directors approval in September 2019)**

#### **4.0 Definitions**

Terms such as “discrimination”, “harassment,” “sexual and / or gender-based harassment,” and “reprisal” have a legal meaning. In addition, these terms may already be defined in collective agreement provisions. If the terms are not already defined in a collective agreement, see the Glossary of Terms, which is incorporated in this Policy as an appendix and as a guide. The Glossary of Terms does not replace or supersede existing definitions contained in collective agreement provisions.

This Policy prohibits discrimination and/or harassment on the protected grounds articulated in the *Code*:

- a) age;
- b) ancestry, colour, race;
- c) citizenship;
- d) ethnic origin;
- e) place of origin;
- f) creed;
- g) disability;
- h) family status (parent and child relationship);
- i) marital status (including single, widowed, divorced or separated status);
- j) gender identity, gender expression;
- k) receipt of public assistance (in housing only);
- l) record of offenses (in employment only);
- m) sex (including pregnancy and breastfeeding); and
- n) sexual orientation.

#### **4.1 Harassment**

Harassment means engagement in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome. Although Harassment does not necessarily have to be tied to a prohibited ground, it may include Cyber Harassment, Sexual and/or Gender-Based Harassment, and Religious Based Harassment. Examples of harassing conduct include the following kinds of behaviour: racial epithets or slurs, disrespectful jokes or banter, sex comments about physical appearance or sexual attractiveness, negative stereotypes about a particular ethnic group, homophobic remarks, disparagement of religious devotions, the circulation of insulting or demeaning written material and pictures, and unwelcome physical contact. Fair, firm, legitimate, constructive, and/or direct criticism of an employee or student's performance does not constitute Harassment.

## **4.2 Sexual and/or Gender-Based Harassment**

Sexual and/or Gender-Based Harassment, including Workplace Sexual Harassment, means engaging in a course of comment or conduct with respect to an individual because of their sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. Sexual Harassment also includes making a sexual solicitation or advance to an individual where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the individual and the person knows or ought reasonably to know that the solicitation or advance is unwelcome; or is inappropriate because of the nature of the relationship. This can also include retaliating when someone ends a relationship or refuses a sexual advance, making professional decisions about someone or offering them job related benefits based on their willingness to comply with sexual demands, or circulating intimate details of someone's life or private sexual behaviour.

NOSM upholds and respects is committed to provide a safe and inclusive environment where employees and learners can work and study free of sexual and gender-based violence. Concerns with respect to sexual violence will be dealt with under the Prevention of Sexual Violence Policy.

## **4.3 Discrimination**

Discrimination means an unjust or prejudicial form of unequal treatment, whether imposing extra burdens or denying benefits, based on any of the protected grounds articulated in the *Code*. Discrimination may be intentional or unintentional. It may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that are not visible and/or appear neutral, but disadvantage certain groups of people (systemic discrimination or adverse discrimination). Discrimination may take obvious forms, or it may happen in very subtle ways. Even if there are many factors affecting a decision or action, if Discrimination is one factor connected to the disadvantage, then the single discriminatory factor may constitute a violation of this Policy.

NOSM respects and upholds its obligation to provide reasonable accommodation to employees and learners. Concerns with respect to differential treatment necessary for accommodation will be dealt with under the Accommodation Policy.

## **4.4 Intimidation**

Intimidation is behaviour which instils fear and is used to denote conduct that is designed to force someone to do something they would ordinarily not do or alternatively, refrain from doing something they would ordinarily do. It may involve using one's authority to influence other people's behaviour and can reduce the extent to which people are willing to exercise their rights. Abuse of power can involve the exploitation of trust and authority to improper ends. Sometimes abuse of power takes the form of apparently positive conduct, such as unfair favouritism or flattery that is intended to persuade someone to co-operate.

Examples of Intimidation and abusive conduct include the following kinds of behaviour: shouting or unreasonably raising one's voice, constant interruptions, demeaning dismissive remarks,

refusing to listen to public criticism, ridicule, targeting and singling someone out, unduly grilling or interrogation, unjust and excessive assignment of duties, threats of physical harm or actual physical punishment (e.g. hitting, slapping, kicking), and requirements to perform personal services (e.g. shopping, babysitting).

Intimidation does not include the good faith exercise of supervisory responsibilities, including without limitation, assessments and criticisms of the employee's performance or the learner's academic efforts, even where the employee or learner do not agree with such assessment(s) or criticism(s) or finds the process uncomfortable or difficult.

### **4.5 Personal (non-Code) Harassment**

Personal (non-Code) Harassment is a course of vexatious behaviour that is not connected to a protected ground identified in the *Code*. Personal Harassment is improper comment and/or conduct, not related to legitimate work or learning purposes. It can include psychological harassment, bullying or intimidation directed at and offensive to another person or persons in the workplace or learning environment, which the individual knows or ought to reasonably know would offend, harm or causes humiliation and embarrassment.

Personal (non-Code) harassment often involves grouping of behaviours and can manifest as bullying. Bullying involves repeated incidents of aggression or persistent behaviour that belittles, insults, disparages or humiliates causing the individual to feel vulnerable and interferes with their ability to function in the environment. However, a single serious incident of such behaviour that has a lasting harmful effect on a member of the NOSM community and may also constitute Personal Harassment. Examples of Personal Harassment include:

- frequent angry shouting / yelling or blow-ups;
- regular use of profanity and abusive or violent language;
- physical, verbal or email threats or intimidation;
- hostile behaviours, slamming doors, throwing objects;
- targeting individual(s) in humiliating practical jokes;
- excluding, shunning, impeding work performance;
- spreading gossip, rumours, Cyberbullying;
- retaliation, undermining, sabotaging;
- unsubstantiated criticism, unreasonable demands;
- insults, name calling;
- public humiliation; and
- communication that is demeaning, insulting, humiliating, mocking.

Personal Harassment does not include:

- the normal exercise of management rights, including the rights to provide direction, to assign tasks, deny requests, set deadlines and supervise, provided these rights are not exercised in a discriminatory, humiliating or abusive manner;
- the normal exercise of management rights, including the right to evaluate, provide constructive feedback, performance manage, reprimand or impose disciplinary

sanctions, provided these rights are not exercised in a discriminatory, humiliating or abusive manner;

- the normal exercise of academic freedom providing that academic freedom is not exercised in a discriminatory, humiliating or abusive manner that serves no legitimate or academic purpose;
- a disagreement, an expression of difference of opinion, misunderstanding or conflict between learners or co-workers;
- work related change of location, co-workers, job assignment;
- rudeness unless it is extreme and repetitive.

### **4.6 Reprisal**

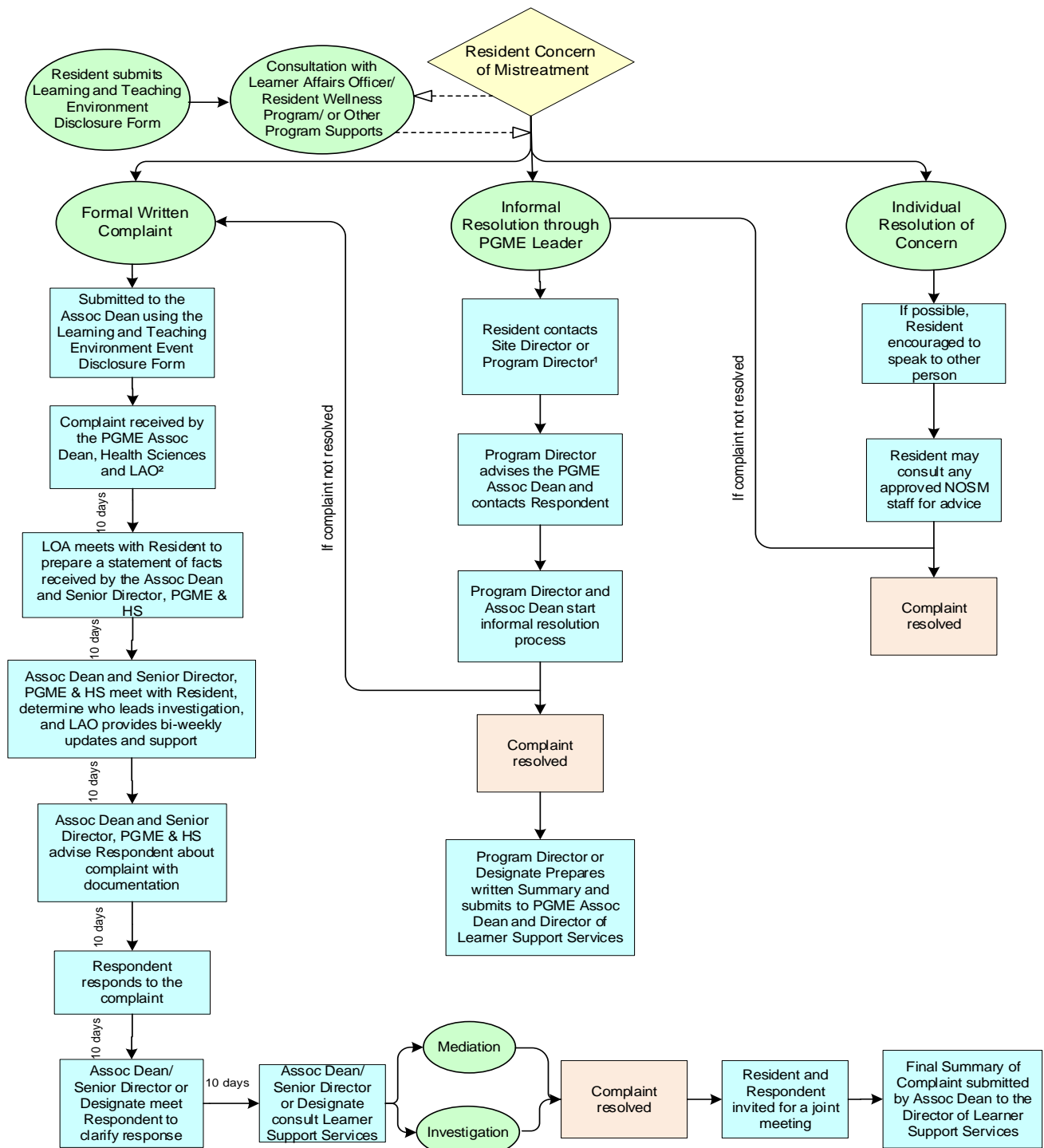
NOSM specifically prohibits reprisal or threats of reprisal against any individual who sincerely and in good faith makes use of this Policy or participates in any process held under its jurisdiction. No person shall be subjected to negative treatment for raising anti-discrimination and harassment concerns or bringing forward a formal complaint, providing information related to a complaint, or participating in an Investigation under this Policy. All Parties, witnesses, advisors, Investigators, and Policy administrators are protected from reprisal. Interference with an Investigation under this Policy will constitute a violation of this Policy.

It is a contravention of this Policy for any individual to reprise or take adverse retaliatory action against others for participating in a process under this Policy. Any individual who believes they are subject of a reprisal or threat of reprisal shall report this to NOSM Human Resources. Any individual or entity found to be engaging in reprisal will be subject to sanctions under this Policy of the same consequences as complaints of discrimination and harassment.

### **Appendix B Flow Chart of the Procedure for Responding to Resident Concerns of Mistreatment**

# PGME Responding to Resident Concerns of Mistreatment

## PROCEDURE FOR RESPONDING TO RESIDENT CONCERNS OF MISTREATMENT



<sup>1</sup> If the subject of the complaint is the Program Director, PGME Assoc Dean will be involved. If the subject of the complaint is the PGME Assoc Dean, or PGME Senior Director, NOSM Human Resources will be notified for follow up.

<sup>2</sup> If the subject of the complaint is the Assoc Dean, Senior Director, PGME & HS or Executive Assistant, PGME & HS, the complainant is advised to contact NOSM Human Resources and PARO for an independent official to serve as the designate individual responsible for overseeing the complaint process.