

**INTERNATIONAL BUSINESS UNIVERSITY (IBU)**

**POLICY CONTROL**

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| <b>Policy Number</b>                      | 1018 (previously 113)   |
| <b>Policy Title</b>                       | IBU’s Workplace Harassment and Discrimination Prevention Policy   |
| <b>Policy Owner / Responsible Offices</b> | Office of the Dean/Vice President   |
| <b>Approval Authority</b>                 | Board of Directors  |
| <b>Applies To</b>                         | All members of the IBU community (students, employees, contractors as applicable, and others as stated in the policy) |
| <b>Approval Date</b>                      | December 23, 2024   |
| <b>Effective Date</b>                     | December 23, 2024   |
| <b>Review Date/s</b>                      | December 2026   |
| <b>Revision Date/s</b>                    | –   |
| <b>Revision Implementation Date/s</b>     | –   |

**1. INTRODUCTION AND BACKGROUND**

Founded by forward-looking academics and business leaders, International Business University (“IBU”, “us”, “we”, and/or “our”) is Ontario’s first independent, not-for-profit university focused on next-generation education, personalized learning, and workforce readiness. IBU combines academic excellence with practical, career-focused learning, preparing students for the challenges of a global business environment. With campuses in Toronto and Ottawa, IBU offers high-quality programs with strong industry involvement. IBU, is committed to fostering and protecting a respectful work, study, and living environment that supports the dignity and equality of all IBU members and provides a climate where human rights are respected and discrimination or harassment is not

tolerated in its educational, employment or business dealings.

Each member of the IBU community has an obligation to create and maintain an environment that is free of harassment and discrimination and is liable for his or her own discriminatory actions. Consistent with the Ontario Human Rights Code, members of University Management have the duty and authority to prevent or discourage harassment or discrimination. They are considered responsible for failing to exercise their authority to do so if and when the person knew or should have known about the harassment or discrimination and could have stopped it.

In implementing this Harassment and Discrimination Prevention Policy (“Policy”), IBU will make every reasonable effort to balance the rights of all parties with the legal responsibility of IBU. Individual needs and special circumstances will be taken into consideration, but in so doing, IBU will balance these against its obligations under this Policy and under law. IBU values and respects academic freedom and freedom of expression, however, IBU recognizes that these freedoms have limits that do not justify or excuse Harassment or Discrimination. The work, study, and living environment extends beyond IBU’s campus to IBU-related functions, work or study assignments outside of IBU, conferences, training sessions, and work or study-related travel.

## 2. PURPOSE

The purpose of this policy is to outline IBU’s legal obligations and ethical responsibilities to foster and protect a work, study, and living environment free from Harassment or Discrimination, and to establish clear institutional expectations for prevention, reporting, response, and resolution. This includes: (i) affirming the right of all members of the IBU community to dignity and equality of treatment and opportunity; (ii) setting standards for conduct across IBU-related environments, including off-campus and electronic contexts where IBU’s work/study environment may be affected; (iii) providing access to Informal Resolution and Formal Resolution processes; (iv) prohibiting retaliation and supporting good-faith disclosures and complaints; and (v) confirming IBU’s Duty to Accommodate members requiring Accommodation based on Protected Grounds, up to the point of Undue Hardship or as required by law.

It is the policy of IBU that all members of our community have a right to a work and study environment that is free from discrimination and harassment on any of the prohibited grounds in the Ontario Human Rights Code including race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex, age, marital status, family status, disability, sexual orientation (and same sex partnership status) and record of offences, as these terms are

defined and interpreted in and by the Ontario Human Rights Code. Furthermore, it is the Policy of IBU that all members of our community have a right to equality of treatment and opportunity in accordance with the Ontario Human Rights Code.

### 3. POLICY STATEMENT

This Policy addresses discrimination, harassment and sexual harassment within our environment recognizing that such conduct may be offensive, degrading, or threatening or that it can foster a hostile or unfair environment. This policy is not intended to constrain social interaction between people at IBU, nor does it apply to the proper exercise of supervisory responsibility (if applied in a non-discriminatory manner). In addition to addressing direct discrimination or harassment, the policy also addresses systemic or constructive discrimination.

### 4. APPLICABILITY

This Policy applies to all members of our community. All Members of our community will be offered appropriate support with respect to issues of harassment and discrimination, regardless of their role in IBU or the role of the person against whom an allegation is made.

1. Acts of Harassment or Discrimination committed by any IBU Member are strictly prohibited.
2. This policy covers acts of Harassment or Discrimination occurring on IBU property, at IBU-related functions, during work or study assignments outside of IBU, at work or study-related conferences or training sessions, during work or study-related travel, or through phone, computer, or other electronic means.
3. IBU is committed to promptly addressing reported incidents of Harassment or Discrimination in an objective and timely manner. Individuals affected by Harassment or Discrimination will have access to Informal Resolution and Formal Resolution processes and resources to address the impacts of Discrimination and Harassment. IBU Members who engage in Harassment or Discrimination will be subject to disciplinary action.
4. IBU strictly prohibits Retaliation against any Complainant or witness. IBU Members who engage in Retaliation will be subject to disciplinary action.
5. Complainants are encouraged to bring forward complaints of Harassment or Discrimination. A Complainant will not be subject to disciplinary action for bringing forward a complaint in good faith. However, IBU takes allegations made in bad faith, i.e.

malicious, frivolous, fraudulent, or vexatious complaints, seriously and will impose disciplinary actions in such cases.

## 5. DEFINITIONS

**Abuse:** It refers to any action, inaction, or behavior that causes harm or poses a risk of harm to an individual. Abuse may take several forms:

1. **Sexual Abuse:** Any sexual activity with a person without their consent or where the individual cannot consent. This includes inappropriate touching, exploitation, or exposure to sexual content.
2. **Physical Abuse:** The use of physical force that results in bodily harm, injury, or risk of injury. Examples include hitting, shaking, or restraining someone inappropriately.
3. **Emotional Abuse:** Behaviors that harm an individual's emotional well-being, including verbal assaults, threats, humiliation, intimidation, or isolation.
4. **Neglect:** Failure to provide necessary care, supervision, or support, which can result in harm or risk of harm.

Abuse can occur in any setting where individuals are under the care or supervision of others. Vulnerable individuals include children, youth, persons with disabilities, and others who may be unable to protect themselves from harm. Recognizing these forms of abuse and understanding who is at risk is critical for prevention, reporting, and response.

**Harassment:** One or a series of vexatious comments or conduct related to one or more of the prohibited grounds that is/are known or might reasonably be known to be unwelcome, offensive, intimidating, hostile or inappropriate. Included in this definition are behaviors or messages from individuals or groups that, in the determination of IBU, could result in psychological distress, discomfort or feelings of harassment/discrimination to vulnerable populations and/or protected identities. Examples include, among others: gestures, remarks, jokes, taunting, innuendo, verbal assault or hazing, shunning or exclusion related to the prohibited grounds. (Note: While the definition covers a wide range of conduct, violations of the Criminal Code such as threats and/or physical assault will be handled under the Violence Prevention Policy).

**Sexual Harassment:** Sexual harassment is covered most appropriately under IBU's Sexual Violence Policy. For both policies, sexual harassment is defined as: One or a series of comments, behaviors, communications, or conduct of a gender-related or sexual nature that is/are known or ought reasonably to be known to be unwelcome, offensive, intimidating, hostile or inappropriate. This includes behavior conducted in whole or in part through electronic means, such as email, web postings, text messaging, and other forms of electronic

behavior. Examples include, but are not limited to, gestures, remarks, jokes, slurs, taunting, innuendo, graffiti/songs/chants, nonconsensual posting of pictures/videos, aggressive comments and slurs on any form of social media or otherwise, verbal assault, unwanted physical contact, invitations, leering, the display of sexually offensive material, sexual solicitation, advances or demands, unwanted attention, implied or express promise of reward or benefit in return for sexual favors. Sexual harassment also includes a reprisal or a threat of reprisal for the rejection of sexual solicitation or advance, where the reprisal is made or threatened by a person in a position to confer, grant or deny a benefit or advancement to the person. (Note: Criminal Code violations, such as sexual assault or stalking, will be handled under the Sexual Violence Prevention Policy)

**Discrimination:** Action(s) or behavior(s) creating unfavorable, adverse or differential treatment related to the Prohibited Grounds. Common examples are refusal to provide goods, services or facilities, exclusion from employment or employment benefits, refusal to work with, teach, or study with someone and/or failure to provide physical access.

**Duty to Accommodate:** IBU has an obligation to make reasonable Accommodations, up to the point of Undue Hardship or as required by law, to service delivery (including teaching and evaluation methods) and employment conditions. These Accommodations aim to reduce or eliminate adverse impacts based on Protected Grounds. Further guidance and procedural details are outlined in Section 13 – Duty to Accommodate of this Policy.

**Formal Resolution:** a resolution achieved in alignment with the Harassment and Discrimination Complaint Procedure, or the appropriate code of conduct, policy, collective agreement, or terms of employment, to address discrimination and harassment allegations and related matters in a structured and documented manner.

**Systemic or Constructive Discrimination:** Policies, practices, procedures, actions or inaction that appear neutral, but have an adverse impact associated with one of the prohibited grounds.

An example is a hiring criterion that is not deemed bona fide and serves to exclude a particular group, or exam schedules that conflict with important religious events.

**Negative or Poisoned Environment:** A series of comments or a pattern of conduct creating a negative environment (hostile, intimidating or offensive) for individuals or groups related to prohibited grounds. The comment or conduct must be of a significant nature or degree and have the effect of "poisoning" the work or study environment. A complainant does not have to be a direct target to be adversely affected by a negative environment. Examples include exposure to graffiti, signs, cartoons and remarks.

**Disclosure:** When someone affected by harassment or discrimination informs a university community member about an incident on or off campus. A disclosure is distinct from a report or formal complaint.

**Employees:** Persons who are on IBU's payroll and work for or provide services to IBU on a permanent, contract, full-time or part-time basis, whether unionized (belonging to a bargaining unit) or not, including administration, faculty, and staff.

**Formal Complaint:** When an individual requests that IBU formally investigate and resolve a complaint of harassment and/or discrimination.

**Protected Grounds:** means race, religious beliefs, colour, gender (including pregnancy), gender identity, gender expression, physical disability, mental disability, ancestry, place or origin, marital status, source of income, family status, sexual orientation, and any other grounds as stated in the Ontario Human Rights Act.

**Reprisal:** Any harassment, intimidation, discipline, demotion, or termination or threat to do so with the intent to compel a university community member to abstain from filing a complaint, disclosing, or reporting an incident of discrimination or harassment or to retaliate against a university community member who has filed a complaint, disclosed, or reported such an incident or who is suspected of doing so.

**Student:** An individual who has been issued a student number from IBU. They may be in the application stage or admitted, formerly enrolled, or registered in either a full-time or part-time course, either credit or non-credit, at IBU, including when on a work placement that is part of their academic program, or when active in a program but not currently enrolled in classes.

This also includes an individual who was enrolled in a course or program when an alleged incident occurred. In this case the individual is deemed a student for the purpose of the investigation until the complaint and appeal processes have been completed.

**Freedom of Expression:** To balance the right to freedom of expression and IBU's responsibility to provide a safe and secure learning environment, individuals and/or groups that are displaying and/or communicating messages and/or images that could, in the judgement of IBU, create psychologically distressing conditions will be required to be located in a particular area/space to ensure that members of the community can choose the types of materials they are exposed to.

**Non-adjudicative resolution:** This term refers to a resolution of the matters alleged in a Report that is agreed to by both the Complainant and the Respondent.

**Informal Resolution:** refers to a resolution without invoking formal procedures. Informal resolutions may include activities such as coaching, counselling, supporting, mediating, or facilitating the resolution of a complaint. However, an informal resolution may not be suitable for all situations.

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## 6.1 COMPLAINT PROCEDURES

Separate complaint procedures exist under this policy for students and for employees. One Complaint Procedure outlines the process for dealing with complaints against an Employee. A separate Complaint Procedure outlines the process for dealing with complaints against a student. Non-Human Rights Code-related complaints by employees against students are to be made under the Student Code of Conduct policy and procedures.

IBU recognizes that members of IBU community may be subject to harassment by others with whom IBU conducts business, including Contractors (e.g. those undertaking construction, provision of service of research), visitors and members of the Board of Governors. In these circumstances, IBU acknowledges its responsibility to support and assist anyone subject to such harassment, however, it falls outside of IBU's Policy and Procedures.

This policy covers incidents that occur both on and off University premises which affect IBU working and/or learning environment (for example, discrimination and harassment that occurs on campus, off campus, at university-related work or social functions, during work or travel on university business, over the phone or computer). In off-campus situations, there must be the potential for discrimination or harassment to adversely impact the work/study environment or to create a poisoned environment. Incidents occurring off campus which have no likelihood of impact on the work/study environment are to be pursued through the Ontario Human Rights Commission or any other relevant legislation but will not be dealt with under this policy.

IBU is responsible for the costs of administering this policy, including processing complaints, and arranging for mediation and investigation services but not for any legal costs incurred personally by the complainant or respondent.

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## 6.2 ACADEMIC FREEDOM AND FREEDOM OF SPEECH

Free speech or expression is central to the operations of IBU as a university. Attempts to prevent free speech and free expression are contrary to the guiding principles of IBU. IBU's faculty are entitled to conduct research and publish results according to the principles, sources and methods of their academic disciplines without interference, coercion, or censure. In addition, it is expected that they will teach, articulate and exchange ideas with integrity and professionalism, in a spirit of openness, curiosity, honesty and engagement.

IBU's Harassment and Discrimination Prevention Policy is not intended to inhibit academic

freedom or the exercise of free speech or free expression. It reminds all members of IBU Community that, in exercising our freedoms, we all have a responsibility to respect the rights and freedoms of others, including the right to study and work in an environment which is free of discrimination and harassment.

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### 6.3 RECONCILING COMPETING RIGHTS

Members of IBU community must be able to exercise their right of free speech and academic freedom even when they entail raising deeply disturbing questions and provocative challenges to the cherished beliefs of society at large and of IBU itself.

The task of respecting the rights of freedom from prohibited discrimination and harassment together with freedom of speech, expression and inquiry is difficult and complex and raises issues which lie at the very core of IBU's purpose and mission. Attempts to formulate a comprehensive code of conduct which defines precisely what is permitted and what is forbidden are impractical because of the difficulty of anticipating the range of possible conflicts and determining in advance the proper balance.

IBU aspires to achieve an appropriate balance between these rights in order to maximize the capacity of every individual to flourish to the fullest extent possible.

IBU's Harassment and Discrimination Prevention Policy is not intended to inhibit academic freedom. It reminds all members of the IBU Community that, in exercising our freedoms, we all have a responsibility to respect the rights and freedoms of others, including the right to study and work in an environment which is free of discrimination and harassment.

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### 6.4 PREVENTION

It is the responsibility of IBU to take steps to ensure an environment free of harassment and discrimination and to inform and educate members of IBU community.

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### 6.5 GENERAL PRINCIPLES

As an important part of this policy, the complaint procedures provide an internal mechanism for receiving complaints of discrimination or harassment and setting out a process by which IBU will deal with a complaint received.

Although IBU's complaint procedure is written in the language of an individual complaint, group complaints may be brought under this policy. Similarly, there may be more than one respondent involved in a complaint.

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### 6.6 TIMELINES

A complaint, either formal or informal, must be filed within six (6) months of the incident except in extenuating circumstances that would explain the delay. Should a late complaint be filed, IBU will assess the extenuating circumstances against any prejudice to a respondent and/or to IBU to determine if the matter should proceed through the complaint process.

A complaint of harassment and discrimination can be filed under this Policy by any member of IBU community. The Employee or Student Harassment and Discrimination Procedures set out further details respecting their respective complaint/report process and the handling of investigations.

IBU will seek to provide procedural fairness to both complainants and respondents in dealing with all complaints as outlined in the Employee or Student Harassment and Discrimination Prevention Procedures.

A complainant has the right to withdraw a complaint or choose not to participate in an investigation at any stage of the process. However, IBU may continue to act on the issue identified in the complaint in order to comply with its obligation under this Policy and/or its legal obligations.

All members of IBU community who have witnessed or have knowledge of harassment or discrimination have a duty to cooperate with a university investigation.

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#### 6.7 PROTECTION FROM REPRISALS, RETALIATION OR THREATS:

It is contrary to this Policy for anyone to retaliate, engage in reprisals or threaten to retaliate against a complainant or other individual(s) for:

- having pursued rights under this Policy or other related University policy or procedures and regulations/laws.
- having participated or co-operated in an investigation under this Policy or other related University policy or procedures and regulations/laws; or
- having been associated with someone who has pursued rights under this Policy or other related University policy or procedures and regulations/laws.
- IBU takes reasonable steps to protect persons from reprisal, retaliation, and threats. This may entail, for example, directing individuals in writing to refrain from engaging in reprisal, retaliation, or threatening retaliation and sanctioning individuals for a breach of this duty.

- IBU may also address the potential for reprisal by providing an accommodation appropriate in the circumstance.

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## 6.8 DUTY TO ACCOMMODATE

- IBU is committed to providing reasonable Accommodation for IBU Members based on Protected Grounds, up to the point of Undue Hardship or as required by law.
- Accommodation is a shared responsibility. Effective Accommodation arises from cooperation and clear communication between IBU Members. IBU Members may be asked to try different Accommodation options.
- IBU provides reasonable Accommodation up to the point of Undue Hardship but is not obligated to provide preferred or perfect Accommodation measures. The Accommodation process involves identifying alternatives and selecting the most effective approach, while minimizing the costs and negative impacts on IBU and other IBU Members.
- Some practices, policies, standards, rules, or decisions with adverse effects may be considered reasonable and justifiable if they are shown to be a “bona fide requirement” or a “bona fide occupational requirement”.
- IBU is not required to lower academic or non-academic standards as part of its duty to Accommodate. Similarly, students remain responsible for developing the essential skills and competencies expected of all students in their programs.
- All students are required to adhere to the Code of Student Conduct.

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## 6.9 UNSUBSTANTIATED OR VEXATIOUS COMPLAINTS

If a person, in good faith, discloses or files a sexual violence or sexual assault complaint that is not supported by evidence gathered during an investigation, that complaint will be dismissed.

Disclosures or complaints that are found, following investigation to be unsubstantiated or vexatious, that is, made to purposely annoy, embarrass or harm the respondent, may result in sanctions and/or discipline against the complainant other individual responsible.

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## 6.10 FRIVOLOUS OR BAD FAITH CONDUCT

Allegations of harassment or discrimination are serious matters. Complaints made without sufficient grounds to purposely annoy, embarrass, or harm the respondent are considered frivolous or bad faith complaints. Such conduct undermines the integrity of IBU's processes and may result in appropriate sanctions and/or disciplinary action against the complainant or other individual responsible.

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## 6.11 PRINCIPLES RESPECTING PROCESS

A person who has made a Disclosure and/or a Report of harassment or discrimination has autonomy in decision-making, and in particular with respect to whom to Disclose, whether to Report, whether to pursue recourse to the criminal or civil justice systems, and whether to access support and accommodations.

IBU is committed to the provision of a fair process for all parties and one that respects due process and procedural fairness.

IBU is committed to reducing barriers to Disclosure and Reporting of incidents of Sexual Violence. In that regard, Complainants will not be asked to repeat their accounts more than is necessary for the implementation of this Policy.

IBU process will appropriately accommodate the needs of Members of IBU Community who are affected by harassment and discrimination.

IBU will not tolerate any retaliation, through any means including through social or other electronic media, against anyone who Discloses or Reports an Incident of harassment and or discrimination, or who participates in a university process that is addressing allegations of harassment and/or discrimination against a Member of IBU Community.

Confidential counselling and support will be made available as quickly as practicable to any Member of the IBU Community who experiences an Incident of discrimination or harassment.

IBU will respond to Disclosures and/or Reports of harassment or discrimination fairly and expeditiously.

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## 6.12 CONFIDENTIALITY

IBU will treat disclosures and reports of incidents of harassment and discrimination in a confidential manner in accordance with the Freedom of Information and Protection of Privacy Act.

Confidentiality is important to those who have disclosed harassment and discrimination. The confidentiality of all persons involved in such a report must be strictly observed, and IBU does its best to respect the confidentiality of all persons, including the complainant, respondent, and witnesses by restricting routine access to information to individuals with a need for such access and by providing education and training to those who are regularly involved in the administration of reports and complaints.

IBU will limit sharing of information to those within IBU who need to know the information for the purposes of implementing this Policy, including providing accommodation, interim conditions and interim measures, and the investigation and decision-making processes; and taking corrective action resulting from those processes. For example, where a Complainant wishes to make a Report, fairness to the Respondent will require disclosure of the Complainant's identity and the material allegations being made.

However, confidentiality cannot be assured in the following circumstances :

- an individual is at imminent risk of self-harm;
- an individual is at imminent risk of harming another; and/or
- there are reasonable grounds to believe that others in IBU or wider community may be at risk of harm;
- reporting or investigation is required by law (for example, but not limited to, an incident involving an obligation related to occupational health and safety or to human rights legislation).

In such circumstances, information would only be shared with necessary services to prevent harm, and the name of the complainant would not be released to the public. Where IBU becomes aware of an allegation of harassment or discrimination by a member of IBU community against another member of IBU community, IBU may also have an obligation to take steps to ensure that the matter is dealt with in order to comply with IBU's legal obligation and/or its policies to investigate such allegations. In such cases, certain University administrators will be informed about the reported incident on a "need to know" and confidential basis, but not necessarily of the identities of the persons involved.

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### 6.13 SAFETY AND SECURITY ISSUES

IBU has the right to take action or direct procedures which diverge from sections of this policy when the safety of the individual and/or University community members is at risk.

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### 6.14 SUPERVISION MEASURES

To ensure the safety and well-being of the IBU community, there are set of comprehensive supervision practices that must be consistently observed by designated staff members.

These practices include:

- **Staff-to-Student Ratios:** Establishing clear ratios to guarantee sufficient oversight of students during university programs, events, or activities.
- **Two-Person Rule:** Requiring that a minimum of two authorized staff members be present during certain activities or within specific settings to mitigate potential risks.
- **Enhanced Oversight Procedures:** Applying monitoring systems, routine check-ins, reporting mechanisms, and emergency response protocols to ensure timely and effective handling of any issues that may arise.

These supervision practices are designed to reduce risks, strengthen accountability, and maintain a secure environment for all members of the IBU community. Adherence to these measures is mandatory for all faculty and staff and plays a critical role in preventing, detecting, and responding to safety concerns in a timely manner.

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### 6.15 TRAINING AND ORIENTATION

To foster a safe, supportive, and accountable environment within the IBU community, all faculty and staff are required to participate in structured training and orientation programs upon their appointment and at regular intervals thereafter. The program will include the following components:

- **Recognition of Abuse:** Training on how to recognize the signs and indicators of abuse, in all its forms, that may affect students, staff, or community members.

- **Reporting Responsibilities:** Clear instructions on reporting suspected or confirmed incidents of abuse, including established procedures, timelines, and escalation protocols.
- **Ongoing Training Requirements:** Mandatory orientation at the start of engagement, supplemented by scheduled refresher sessions to reinforce awareness of best practices, institutional policies, and applicable legal or regulatory standards.

Adherence to these training and orientation requirements is compulsory for all members of the IBU workforce and is essential to ensuring the prevention, early identification, and effective management of any incidents that may compromise the safety or well-being of the University community.

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#### 6.16 PARALLEL PROCESSES

It is recognized that complaints may be pursued under the Ontario Human Rights Code directly with the Ontario Human Rights Commission, Police or the courts.

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#### 6.17 BALANCE OF PROBABILITIES

This represents the standard of proof that must be met in order to draw the conclusion that it is more likely than not that the allegation or fact asserted is true, based on sufficient, relative, probative and credible evidence.

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#### 6.18 RIGHT TO WITHDRAW A COMPLAINT

A complainant has the right to withdraw a complaint at any stage of the process. However, IBU may continue to act on the issue identified in the complaint in order to comply with its legal obligations under the Ontario Human Rights Code.

### 7. ROLES AND RESPONSIBILITIES

The responsibility and authority for adherence and review of this policy resides with the Dean/Vice President (or designate), with that responsibility shared with IBU's Academic Council, Board of Governors department chairs and faculty, as appropriate.

- **All IBU Members:** Maintain an environment free of harassment and discrimination and cooperate with investigations as required.
- **University Management:** Exercise the duty and authority to prevent or discourage harassment or discrimination where they knew or should have known and could have stopped it.
- **Registrar and Director of Enrolment Services and Student Success:** Receive questions/concerns regarding treatment of personal information as stated in the policy.

## 8. REVIEW

This policy will be reviewed by December 2026, or earlier if required by law, institutional change, or emerging risk considerations.

## 9. COMPLIANCE PROCEDURES

Non-compliance with this policy, including retaliation, failure to cooperate with an investigation, or engaging in harassment or discrimination, may result in corrective actions and/or disciplinary action, consistent with applicable IBU policies, procedures, and law.

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### 9.1 COMPLIANCE – RECORD KEEPING, INCIDENT RESPONSE, AND RISK MANAGEMENT

In order to uphold a safe, transparent, and accountable environment within IBU, all faculty and staff are expected to comply with established procedures relating to documentation, incident handling, and risk management.

1. **Record Keeping:** All incidents, concerns, observations, and actions taken must be documented accurately, promptly, and in sufficient detail to ensure accountability and continuity.
2. **Incident Response:** Established protocols must be followed when addressing incidents or safety concerns, including timely reporting, thorough investigation, appropriate resolution, and, where required, escalation to relevant internal or external authorities.
3. **Risk Assessment:** Regular reviews and evaluations shall be conducted to identify potential risks within programs, activities, and operations, with proactive measures implemented to mitigate these risks effectively.

These procedures are intended to minimize hazards, promote accountability, and safeguard all members of the IBU community. Full compliance is mandatory for all

personnel and faculty, as adherence is critical to the prevention, early detection, and effective management of safety-related concerns.

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## 9.2 REQUESTS FOR MANAGING PERSONAL INFORMATION

Complaints or any questions or concerns that you may have about the treatment of this Policy, should be directed to the Registrar and Director of Enrolment Services and Student Success as follows:

International Business University  
Attention: Swarna Bakshi Saini  
Registrar and Director of Enrolment Services and Student Success  
Email: SSaini@ibu.ca

## 10. EVALUATION AND QUALITY ASSURANCE

IBU will evaluate the effectiveness of this policy through aggregate review of reported trends, training completion, process timelines, and procedural fairness considerations, and will use these insights to strengthen prevention, education, incident response, and risk management practices.

## 11. RELATED DOCUMENTS

- Academic Freedom
- Free Speech
- Sexual Violence Policy
- Freedom of Information and Protection of Privacy Act
- Ontario Human Rights Code
- AODA
- Student Code of Conduct
- Professional Standards Policy
- Occupational Health and Safety Act
- Workplace Threats and Violence Policy and Procedures