IBU International Business University

INTERNATIONAL BUSINESS UNIVERSITY (IBU)

Policy Number	1042
Policy Title	IBU Abuse Prevention Policy
Policy Owner / Responsible Offices	Office of Human Resources, Student Services
Approval Authority	Board of Directors
Applies To	All members of the IBU community and covers abuse or related conduct occurring in any University-related setting, regardless of the individuals involved, with applicable IBU policies applied concurrently where appropriate and immediate protective action taken when necessary.
Approval Date	April 15, 2026
Effective Date	April 15, 2026
Review Date/s	Every five (5) years, or earlier
Revision Date/s	-
Revision Implementation Date/s	-

1. INTRODUCTION AND BACKGROUND

International Business University ("IBU" or the "University") is committed to maintaining a safe, respectful, inclusive, equitable, and professional environment for all members of its community. IBU recognizes that abuse is not limited to situations involving children or vulnerable persons and that inappropriate, abusive, exploitative, or harmful conduct can occur between adults, including in educational environments where there may be differences in authority, influence, dependency, or power.

IBU's student population consists of adults, and the University does not routinely operate programs involving children or require routine vulnerable-sector screening. Nevertheless,

adult students may be vulnerable to abuse in particular circumstances, including where there is a significant power imbalance, dependency, isolation, disability, or a relationship of trust or authority. IBU therefore considers abuse prevention an important component of its broader commitment to student safety, employee safety, professional conduct, human rights, and risk management.

This Policy establishes a practical framework for preventing, identifying, reporting, documenting, and responding to actual or suspected abuse involving members of the IBU community. It is intended to complement IBU's applicable policies, procedures, and legal obligations and to support a consistent approach to safeguarding students, employees, faculty, instructors, volunteers, contractors, and other individuals participating in University activities.

IBU is committed to treating members of its community with dignity and respect and to maintaining an environment free from abuse, harassment, discrimination, violence, exploitation, and other conduct that may compromise the safety or well-being of individuals.

2. PURPOSE

The purpose of this Policy is to establish reasonable measures to prevent and reduce the risk of abuse within the IBU community and to provide clear expectations regarding professional conduct, professional boundaries, screening, supervision, training, reporting, response, documentation, and risk management.

IBU is committed to taking reasonable steps to ensure that individuals who interact with students understand appropriate professional boundaries and know how to recognize and respond to potential concerns. Concerns will be addressed promptly, fairly, and with respect for privacy and confidentiality to the extent reasonably possible and permitted by law.

Effective abuse prevention requires both preventative and responsive measures. Accordingly, IBU will use reasonable measures including appropriate hiring and screening practices, orientation and training, supervision controls, professional-boundary requirements, risk assessments, reporting mechanisms, and periodic review of safeguarding practices.

3. POLICY STATEMENT

IBU does not tolerate abuse, exploitation, harassment, violence, discrimination, retaliation, or other conduct that compromises the safety, dignity, or well-being of any member of the University community.

All employees, faculty, instructors, volunteers, contractors, students, and other members of the IBU community are expected to conduct themselves in a manner that promotes safety, respect, professionalism, and appropriate boundaries. Individuals who occupy positions of authority, trust, influence, or responsibility in relation to students have a particular responsibility to maintain appropriate professional boundaries and to take reasonable steps to prevent and report conduct that may place a student or other individual at risk.

IBU will take reasonable measures to prevent, identify, and respond to suspected or actual abuse. Concerns will be taken seriously and addressed in a manner that prioritizes safety while maintaining procedural fairness for all persons involved.

Nothing in this Policy limits any legal obligation, statutory reporting requirement, contractual obligation, academic freedom, free speech, or right available under applicable legislation or IBU's applicable policies and procedures.

4. APPLICABILITY

This Policy applies to the entire IBU community, including employees, faculty, instructors, administrators, volunteers, contractors, consultants, agents, students, and other individuals engaged by, working for, studying at, or participating in activities organized or sponsored by IBU.

The Policy applies to conduct occurring on IBU premises, at University-sponsored or University-related activities and events, during off-campus activities, work or study assignments, conferences, training, travel, social or other University-related functions, and in virtual or electronic environments where the conduct involves members of the IBU community or is connected to University activities.

The Policy applies regardless of the status or position of the person alleged to have engaged in the conduct. Abuse may involve an employee and student, instructor and student, student and student, employee and employee, contractor and student, or any other relationship within the University community.

Where conduct may fall within more than one IBU policy or procedure, the applicable IBU policies and procedures may be applied concurrently. Nothing in this Policy prevents IBU from taking immediate protective, administrative, or other appropriate action where necessary to address a safety concern.

5. DEFINITIONS

For the purposes of this Policy, the following definitions apply:

Abuse means any act, omission, or behaviour that causes, or creates a significant risk of, physical, sexual, emotional, psychological, or other harm to another person. Abuse may

consist of a single serious incident or a pattern of conduct and may occur in person or through electronic, online, or other forms of communication.

Sexual Abuse means non-consensual, coercive, exploitative, or otherwise inappropriate sexual conduct, including unwanted sexual touching, sexual assault, sexual exploitation, or the use of a position of authority, trust, influence, or dependency for a sexual purpose. Conduct involving sexual violence or sexual harassment will be addressed in accordance with applicable legislation and IBU's applicable policies and procedures.

Physical Abuse means the intentional or reckless use of physical force or conduct that causes, or could reasonably be expected to cause, bodily harm or injury, including hitting, striking, pushing, assault, or inappropriate physical restraint.

Emotional or Psychological Abuse means conduct that causes, or is reasonably likely to cause, significant emotional or psychological harm, including intimidation, threats, humiliation, degradation, coercion, manipulation, or isolation.

Harassment means unwelcome comments or conduct that are known, or ought reasonably to be known, to be unwelcome, offensive, intimidating, hostile, or inappropriate. Harassment may occur in person or through electronic or other forms of communication. Conduct that falls within applicable legislation or IBU's applicable policies and procedures will be addressed in accordance with the applicable framework.

Discrimination means adverse, differential, or unfavourable treatment of an individual or group based on a protected or prohibited ground under applicable human rights legislation. Discrimination may be direct or indirect and may arise through an act, omission, practice, policy, or other conduct. Matters involving discrimination will be addressed in accordance with applicable legislation and IBU's applicable policies and procedures.

Sexual Harassment means unwelcome comments, conduct, communications, or behaviour of a sexual or gender-related nature that are known, or ought reasonably to be known, to be unwelcome, offensive, intimidating, hostile, or inappropriate. It may include unwanted sexual attention, sexual comments or advances, sexually explicit communications, or other inappropriate sexual conduct. Sexual harassment will be addressed in accordance with applicable legislation and IBU's applicable policies and procedures.

Relationship to Other Conduct: Harassment, discrimination, sexual harassment, violence, and other misconduct may, depending on the circumstances, constitute or contribute to abuse, particularly where the conduct involves a significant power imbalance, exploitation, intimidation, or harm. Where conduct falls within more than one IBU policy or procedure, the applicable policies and procedures may be applied concurrently.

Neglect means a failure by a person who has responsibility, authority, or a duty of care in the circumstances to take reasonable steps to protect another individual from foreseeable harm or to provide appropriate support or assistance. Given IBU's adult student population,

neglect will generally be considered in the context of a specific responsibility, dependency, or duty between individuals.

Professional Boundaries means the appropriate limits governing relationships and interactions within the University Community, particularly where one person has authority, influence, supervisory responsibility, or a position of trust in relation to another. Interactions must remain appropriate to the legitimate educational, administrative, employment, or other University-related purpose of the relationship.

Vulnerable Person means an adult who, because of circumstances such as disability, dependency, isolation, communication barriers, a significant power imbalance, or other factors, may be particularly susceptible to harm or exploitation. This definition does not imply that IBU's students are children or that IBU routinely operates programs involving children or vulnerable-sector exposure.

Employee means any person employed by IBU, whether full-time, part-time, temporary, casual, contract, or in another employment capacity, including faculty, administration, and staff.

Volunteer means an individual who provides services or assistance to IBU without an expectation of compensation and who may have responsibilities involving students, University activities, or University operations.

Contractor or Service Provider means an individual or organization retained by IBU to provide instruction, consulting, operational support, or other services on behalf of or in connection with the University.

Student means an individual enrolled in or participating in an educational, training, or academic program offered or administered by IBU. For the purposes of this Policy, an individual who was enrolled at the time of an alleged incident may continue to be treated as a student for the purposes of addressing the matter.

University Community means the individuals to whom this Policy applies, including students, employees, faculty, instructors, volunteers, contractors, service providers, consultants, agents, and other individuals participating in IBU activities.

Complainant means an individual who reports or makes a complaint regarding suspected abuse or other conduct addressed by this Policy.

Respondent means an individual who is the subject of a complaint or allegation. The use of this term does not imply that the allegation has been substantiated or that the Respondent has engaged in wrongdoing.

Report means a verbal or written communication identifying an actual, suspected, witnessed, disclosed, or otherwise concerning incident of abuse or other conduct that may fall within this Policy.

Disclosure means the communication of information about an incident or concern to a member of the University Community. A disclosure is distinct from a formal complaint or investigation request.

Reprisal means retaliation, intimidation, adverse treatment, discipline, or a threat of such conduct against an individual because they made a good-faith report or disclosure, participated in an investigation, or otherwise exercised a right or fulfilled a responsibility under this Policy or applicable law.

6. PREVENTION AND PROFESSIONAL BOUNDARIES

IBU expects all members of its community to maintain appropriate professional boundaries. Employees, faculty, instructors, volunteers, contractors, and other individuals exercising authority or influence over students must conduct themselves professionally and must not exploit their position of trust, authority, or influence.

Interactions with students should, wherever reasonably practicable, be observable and capable of appropriate oversight. Private meetings should occur in appropriate professional settings, and individuals should avoid unnecessary situations that could create an unreasonable risk of abuse, boundary violations, or allegations of inappropriate conduct.

Electronic and online communications with students must be professional and for legitimate educational, administrative, or University-related purposes. Where reasonably practicable, University-approved communication systems should be used. Personal, secretive, exploitative, sexually inappropriate, or excessively personal communications with students are prohibited.

Any physical contact with a student must be appropriate to the circumstances and consistent with professional standards. Conduct that is sexual, threatening, coercive, degrading, exploitative, or otherwise inconsistent with a professional student-employee or student-instructor relationship is prohibited.

IBU will take reasonable steps to promote awareness and education concerning abuse prevention, professional boundaries, human rights, respectful conduct, and reporting responsibilities.

7. HIRING, SCREENING AND ORIENTATION

IBU will take reasonable steps to ensure that individuals engaged to work with or supervise students are appropriately screened before commencing their duties. Hiring and screening practices will be proportionate to the position and the level of access or contact the individual has with students.

Where appropriate to the role and permitted by applicable law, IBU may conduct criminal background checks and, where legally applicable, Vulnerable Sector Checks. IBU will determine whether enhanced screening is appropriate for particular positions based on the nature of the duties and level of student contact.

Any police record check will be requested, conducted, and disclosed only in accordance with the Police Record Checks Reform Act, 2015, including obtaining the individual's written consent, requesting only the type of check appropriate to the position, and limiting the use and disclosure of results to the purpose for which they were obtained.

References and employment history will be reviewed as appropriate. Individuals will receive orientation to IBU's expectations regarding professional conduct, student safety, abuse prevention, reporting obligations, confidentiality, and professional boundaries before or at the commencement of their duties.

Where periodic screening is required or appropriate to the role, criminal background checks and applicable screening checks will generally be renewed at intervals of three to five years, or more frequently where required by law, the nature of the position, identified risks, or IBU's screening requirements.

8. SUPERVISION AND RISK MANAGEMENT

IBU will maintain reasonable supervision and oversight measures appropriate to its programs and operating environment. The University will assess activities involving students to determine whether additional supervision or safeguards are appropriate, particularly where activities involve travel, off-campus events, individual meetings, unfamiliar locations, or increased opportunities for isolation.

Where reasonably practicable, IBU will follow a two-person or observable-interaction approach for activities presenting elevated safeguarding risks. Individual meetings that are necessary for legitimate academic, administrative, counselling, or student-support purposes should take place in settings that are observable or otherwise subject to appropriate oversight.

IBU will periodically assess its physical environment, programs, activities, and operational practices to identify circumstances that could increase the risk of abuse. Where risks are identified, IBU will implement reasonable measures such as enhanced supervision, changes to procedures, environmental controls, training, or other appropriate safeguards.

IBU operates post-secondary educational and training programs for adult students, including classroom-based, online, experiential, and other University-related academic and student-support activities. Activities may occur on campus, online, or at off-campus locations in connection with University programs or events. IBU's supervision measures are proportionate to the nature and risk of the activity and may include appropriate staff

oversight, observable interactions, two-person arrangements, and additional safeguards where identified through risk assessment.

IBU does not generally operate programs involving children or activities requiring fixed child-to-staff ratios. Where an activity presents an elevated safeguarding risk, appropriate supervision levels will be established based on the nature of the activity, number of participants, location, duration, staffing, and other relevant risk factors.

9. TRAINING AND AWARENESS

IBU will provide appropriate training and orientation to employees, faculty, instructors, volunteers, and other individuals whose responsibilities require regular interaction with students.

Training will address recognition of potential indicators of abuse and neglect, professional boundaries, appropriate student interactions, reporting responsibilities, confidentiality, respectful conduct, and procedures to be followed when concerns arise.

Training will be provided at commencement of duties and refreshed periodically, with additional or annual refresher training where appropriate to the role. Managers, supervisors, and individuals responsible for receiving or responding to complaints will receive additional guidance appropriate to their responsibilities.

IBU will maintain records of required training and periodically review its training program to ensure that it remains appropriate to the University's operations and applicable legal requirements.

10. REPORTING AND RESPONSE

Any person who experiences, witnesses, receives a disclosure of, or otherwise becomes aware of suspected abuse or inappropriate conduct should report the concern as soon as reasonably practicable in accordance with IBU's applicable reporting procedures.

Where there is an immediate threat to safety or an emergency, emergency services or law enforcement should be contacted as appropriate.

Individuals receiving a report must take the concern seriously, respond promptly, preserve relevant information, and escalate the matter to the appropriate University authority. A person making a report should not attempt to conduct an independent investigation or confront an alleged perpetrator where doing so could compromise safety or an external investigation.

IBU will respond to reports in a manner that prioritizes safety, procedural fairness, privacy, and compliance with applicable law. Depending on the circumstances, the University may

implement interim measures such as changes to duties, increased supervision, restrictions on contact, temporary removal from student-facing activities, or other appropriate administrative measures.

Where conduct may constitute a criminal offence or otherwise requires reporting to an external authority, IBU will cooperate with law enforcement or other appropriate authorities as required by law or otherwise appropriate in the circumstances.

Although IBU's programs are directed to adults, any person who has reasonable grounds to suspect that a child under the age of sixteen (16), or a child aged sixteen (16) or seventeen (17) who is subject to a child protection order, is or may be in need of protection must directly and promptly report the suspicion and the information on which it is based to a children's aid society, as required by section 125 of the Child, Youth and Family Services Act, 2017. This duty cannot be delegated to another person, including a supervisor, and applies in addition to any internal reporting under this Policy.

Reports will be investigated in a timely manner by a trained and impartial investigator, who may be internal or external to IBU, appropriate to the circumstances. Where the matter involves workplace harassment or workplace violence, IBU will follow its Workplace Violence and Harassment Prevention Program and, as required by the Occupational Health and Safety Act, will inform the complainant (if a worker) and the alleged harasser (if a worker) in writing of the results of the investigation and of any corrective action taken or to be taken.

Allegations of sexual violence, or of sexual misconduct by an employee towards a student, will be addressed in accordance with IBU's Sexual Violence Policy and the relevant laws and regulations, as applicable. IBU's policies will include examples of the disciplinary measures that may be imposed on an employee who has committed sexual abuse of a student, and IBU will not enter into any agreement that prohibits the disclosure of the fact that an employee has been found to have committed sexual abuse of a student, or of related information, contrary to the applicable laws and regulations.

11. CONFIDENTIALITY, DOCUMENTATION AND RECORD KEEPING

IBU will make reasonable efforts to protect the privacy and confidentiality of individuals involved in an abuse concern or investigation. Information will be shared only where reasonably necessary to respond to the matter, protect individuals, conduct an investigation, comply with legal obligations, or otherwise fulfill legitimate University responsibilities.

Confidentiality cannot be guaranteed where disclosure is required by law, necessary to address an immediate or serious safety concern, necessary to protect an individual or the University community, or otherwise required to fulfill IBU's legal or institutional obligations.

Reports and related records will be documented promptly and objectively. Records should identify, where applicable, the date, time, location, individuals involved, nature of the concern, information reported or observed, immediate actions taken, notifications made, and subsequent follow-up. Documentation should distinguish facts from assumptions or opinions.

IBU will maintain appropriate records relating to reports, investigations, training, screening, risk assessments, and corrective measures in secure and access-restricted locations and in accordance with applicable privacy legislation and University records-retention requirements.

12. PROTECTION AGAINST REPRISAL AND FALSE REPORTS

IBU prohibits retaliation or reprisal against any person who, in good faith, reports a concern, makes a disclosure, participates in an investigation, or assists with the response to an alleged incident. Reprisals against workers are also prohibited by section 50 of the Occupational Health and Safety Act and by the Ontario Human Rights Code.

Individuals are expected to cooperate honestly with investigations. Knowingly making a false or deliberately misleading allegation may result in appropriate disciplinary or corrective action.

IBU will seek to ensure procedural fairness for all parties. Interim measures are preventive and administrative in nature and do not constitute a finding of wrongdoing.

13. SUPPORT, ACCOMODATION AND ACCESSIBILITY

IBU will take reasonable steps to support individuals affected by abuse or other serious misconduct. Depending on the circumstances, support may include assistance accessing counselling, medical or community resources, academic accommodations, workplace accommodations, or other appropriate supports.

IBU will provide reasonable accommodation to individuals in accordance with applicable human rights legislation and IBU's applicable policies and procedures, up to the point of undue hardship or as otherwise required by law.

Accommodation is a shared responsibility involving cooperation and communication between the University and the individual seeking accommodation. IBU will consider individual needs and circumstances when determining appropriate measures.

IBU will also take reasonable steps to reduce barriers to reporting, disclosure, participation in investigations, and access to support.

14. ACADEMIC FREEDOM AND FREE SPEECH

IBU recognizes and respects academic freedom and free speech. Nothing in this Policy is intended to improperly restrict legitimate academic inquiry, teaching, research, discussion, or expression.

At the same time, academic freedom and free speech do not justify abuse, harassment, discrimination, threats, violence, exploitation, or other conduct prohibited by applicable law or IBU's applicable policies and procedures.

Where competing rights or interests arise, IBU will seek to balance the relevant rights and responsibilities in accordance with applicable law and institutional obligations.

15. PROCEDURAL FAIRNESS, AUTONOMY AND PARALLEL PROCESSES

IBU is committed to responding to concerns fairly and expeditiously while respecting the rights and interests of all persons involved.

Individuals who disclose or report concerns will, to the extent reasonably possible, be informed of available reporting, support, accommodation, and resolution options. Individuals may choose whether to pursue available internal or external processes, subject to IBU's legal obligations and any circumstances in which the University is required to take action.

A complainant may withdraw a complaint or choose not to participate in an investigation at any stage. However, IBU may continue to act on information received where necessary to protect individuals, address a safety concern, comply with legal obligations, or fulfill its institutional responsibilities.

Nothing in this Policy prevents an individual from contacting law enforcement, a regulatory body, a human rights body, or another external authority where permitted or required by law.

Where a matter is also addressed through an external process, IBU may take reasonable administrative or protective measures and will coordinate its response as appropriate and permitted by law.

16. COMPLIANCE AND RESPONSIBILITIES

All members of the IBU community are responsible for complying with this Policy and for contributing to a safe and respectful environment.

Individuals with supervisory, management, teaching, or other positions of authority have a particular responsibility to take reasonable steps to prevent, discourage, and respond to conduct that may place another person at risk.

Failure to comply with this Policy, including engaging in abuse, retaliation, knowingly making false or deliberately misleading allegations, or failing to fulfill applicable responsibilities, may result in corrective or disciplinary action in accordance with applicable law and IBU's applicable policies and procedures.

17. REVIEW AND QUALITY ASSURANCE

IBU will review this Policy at least every five (5) years, or earlier where required due to changes in applicable legislation or regulations, significant changes to IBU's operations or governance structure, significant incidents, audit, or internal control findings, identified risks, or other material institutional developments.

The review will consider the effectiveness of the University's abuse prevention, training, screening, risk assessment, reporting, response, accommodation, and safeguarding measures.

IBU may also evaluate the effectiveness of this Policy through aggregate review of relevant incident trends, training completion, screening practices, risk assessments, reporting and response processes, and other appropriate indicators, while protecting individual privacy and confidentiality.

18. RELATED DOCUMENTS

- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
- Occupational Health and Safety Act
- Applicable privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA), as applicable to IBU
- Child, Youth and Family Services Act, 2017
- Police Record Checks Reform Act, 2015
- IBU Policy for Occupational Health and Safety
- IBU's Sexual Violence Policy
- IBU Workplace Harassment and Discrimination Prevention Policy
- IBU Policy for Workplace Harassment
- IBU Policy for Workplace Violence
- IBU Student Code of Conduct
- IBU Code of Conduct
- IBU Professional Standards Policy
- IBU Policy on Academic Freedom
- IBU Free Speech Policy
- Workplace Violence and Harassment Prevention Program