

SEXUAL VIOLENCE & HARASSMENT POLICY

Aims Healthcare College

Last Updated: August 28, 2024

ACTION PLAN

Per the Sexual Violence Policy, any student at The Aims Healthcare College may file a report of an incident or complaint to Mr. Raj Manvi in writing. However, students are encouraged to speak directly with Mr. Raj Manvi regarding any concerns they may have while understanding to pursue a SEXUAL VIOLENCE POLICY.

1. SEXUAL VIOLENCE POLICY

- a. Aims Healthcare College is committed to providing its students with an educational environment free from sexual violence and treating its students who report incidents of sexual violence with dignity and respect.
- b. Aims Healthcare College has adopted the Sexual Violence Policy, which defines sexual violence and outlines training, reporting, investigative and disciplinary responses to complaints of sexual violence made by its students on its campus or at one of its events and involves students.
- c. The person accused of engaging in sexual violence will be referred to as the “Respondent” and the person making the allegation as the “Complainant.”
- d. If students, in good faith, report an incident of or make a complaint about sexual violence, they will not be subject to discipline or sanctions for violations of the private career college’s policies relating to drug or alcohol use at the time the alleged sexual violence occurred.
- e. Students who disclose their experience of sexual violence through reporting an incident of, making a complaint about, or accessing support and services for sexual violence will not be asked irrelevant questions during the investigation process by the private career college’s staff or investigators, including irrelevant questions relating to the student’s sexual expression or past sexual history.

2. DEFINITION OF SEXUAL VIOLENCE

Sexual violence means any sexual act or acts targeting a person’s sexuality, gender identity or gender expression, whether it acts physically or psychologically. Threatened or attempted against a person without consent includes sexual assault, sexual harassment, stalking, indecent exposure, voyeurism and sexual exploitation.

3. TRAINING, REPORTING AND RESPONDING TO SEXUAL VIOLENCE

- a. Aims Healthcare College shall include a copy of the Sexual Violence Policy in every contract between the College and students. Provide a copy of the Sexual Violence Policy to career college management (corporate directors, controlling shareholders, owners,

partners, other persons who manage or direct the College's affairs, and their agents), instructors, staff, employees and contractors. Train them about the policy and its reporting processes, investigating and responding to complaints of sexual violence involving its students.

- b. Any company offering student internships on their premises must provide an undertaking in writing that complies with all applicable legislation, including the Ontario Human Rights Code. The Occupational Health and Safety Act will provide students access to those policies should they encounter issues relating to sexual violence in the workplace.
- c. Management, instructors, staff, other employees and contractors of Aims Healthcare College will report incidents of or complaints of sexual violence to Mr. Raj Manvi upon becoming aware of them.
- d. Students who have been affected by sexual violence or who need information about support services should contact Mr. Raj Manvi.
- e. Aims Healthcare College will keep all personal information of persons involved in the investigation confidential. Except in those circumstances where it believes an individual is at imminent risk of self-harm or harming another, or there are reasonable grounds to believe that others on its campus or the broader community are at risk.

It will be done by:

- i. ensuring that all complaints/reports and information gathered as a result of the complaint/reports will be only available to those who need to know for purposes of investigation, implementing safety measures and other circumstances that arise from any given case; and
 - ii. ensuring that the documentation is kept in a separate file from the Complainant/student or the Respondent.
- f. Aims Healthcare College recognizes the right of the Complainant not to report an incident of or make a complaint about sexual violence or not request an investigation and not participate in any investigation that may occur.
- g. Aims Healthcare College may be required by law or its internal policies to initiate an internal investigation and inform police without the Complainant's consent if it believes the safety of members of its campus or the broader community is at risk.
- h. Aims Healthcare College will appropriately accommodate the needs of its students affected by sexual violence. Students seeking accommodation should contact Mr. Raj Manvi.

4. INVESTIGATING REPORTS OF SEXUAL VIOLENCE

- a. Under this Sexual Violence Policy, any student of Aims Healthcare College may file an incident report or a complaint to Mr. Raj Manvi in writing.
- b. Upon receipt of a report of an incident or a complaint of alleged sexual violence being made, Mr. Raj Manvi will respond promptly (within 1 day or sooner) and:
 - i. Determine whether an investigation should proceed and if the Complainant wishes to participate in an investigation.

- ii. Determine who should conduct the investigation regarding the seriousness of the allegation and the parties involved.
 - iii. Determine whether the incident should be referred immediately to the police;
 - iv. In such cases or where civil proceedings are commenced in respect of allegations of sexual violence, Aims Healthcare College may conduct its independent investigation and make its determination following its policies and procedures and
 - v. Determine what interim measures should be implemented pending the investigation process, such as removing the Respondent or seeking alternate methods of providing necessary course studies.
- c. Once an investigation is initiated, the following will occur:
- i. The Complainant and the Respondent will be advised that they may ask another person to be present throughout the investigation.
 - ii. Management interviewed the student to ensure a complete understanding of the allegation. They gathered additional information that may not have been included in the written complaint, such as the date and time of the incident. People involved, names of the person who witnessed the incident and a complete description of what occurred.
 - iii. Informing and interviewing the Respondent of the complaint, providing details of the allegations and allowing the Respondent to respond to those allegations and to provide any witnesses the Respondent feels are essential to the investigation.
 - iv. Interviewing any person involved or who has, or may have, knowledge of the incident and any identified witnesses.
 - v. Providing reasonable updates to the Complainant and the Respondent about the status of the investigation; and
 - vi. Following the investigation, Mr. Raj Manvi will:
 - (a) Review all of the evidence collected during the investigation.
 - (b) Determine whether sexual violence occurred and if so
 - (c) Determine what disciplinary action, if any, should be taken as set out below.

5. Disciplinary Measures

- a. If Aims Healthcare College determines that the Respondent did engage in sexual violence, immediate disciplinary or corrective action will be taken. It may include:
 - i. Disciplinary action up to and including termination of employment of instructors or staff; or
 - ii. Expulsion of a student; and
 - iii. The placement of certain restrictions on the Respondent's ability to access certain premises or facilities; and
 - iv. Any other actions that may be appropriate in the circumstances.

6. Appeal

- a. Should the Complainant or the Respondent not agree with the decision resulting from the investigation, they may appeal the decision to Aims Healthcare College within 3 days by submitting a letter addressed to Mr. Raj Manvi.
- b. A response will be provided within 1 business day or sooner to determine the next steps to handle the appeal.
- c. Should an appeal process be set in place, the Complainant must provide all details, including the rationale for not accepting Aims Healthcare College's decision.
- d. An entire case review will begin after receiving the formal appeal in writing.

7. Making False Statements

- a. It violates this Sexual Violence Policy for anyone to knowingly make a false complaint of sexual violence or provide false information about a complaint.
- b. Individuals who violate this Sexual Violence Policy are subject to disciplinary or corrective action up to and including termination of employment of instructors or staff or expulsion of a student.

8. Reprisal

- a. It is a violation of this Sexual Violence Policy to retaliate or threaten to retaliate against a complainant who has brought forward a complaint of sexual violence, provided information related to a complaint, or otherwise been involved in the complaint investigation process.
- b. Individuals who violate the Sexual Violence Policy are subject to disciplinary or corrective action, up to and including termination of employment of instructors or staff or expulsion of a student.

9. Review

- a. Aims Healthcare College shall ensure that student input is considered in developing its Sexual Violence Policy every time it is reviewed or amended.
- b. Aims Healthcare College shall review its Sexual Violence Policy after every 3 years. The next review date is October 31, 2026

10. Collection of Student Data

Aims Healthcare College shall collect and be prepared to provide upon request by the Superintendent of Private Career Colleges such data and information as required according to Subsections 31. 1 (8), (9), (10) and (11) of Schedule 5 of the Private Career Colleges Act, 2005, as amended.

Contact Person

Raj Manvi

Phone: 905-379-3449

Email: rmanvi@aol.com

Resources:

COMMUNITY SERVICES

- ShelterSafe www.sheltersafe.ca
- Kids Help Phone 1-800-668-6868 www.kidshelpphone.ca
- Assaulted Women's Help Line 1-866-863-0511 / TTY 1-866-863-7868 www.awhl.org
- Ontario Native Women's Association (ONWA) www.onwa.ca
- Ontario Coalition of Rape Crisis Centres <http://www.sexualassaultsupport.ca>
- Victim Support Line (Ontario Victim Services) 1-888-579-2888
- Male Survivors of Sexual Abuse Provincial Crisis and Support Line (Ontario Victim Services) 1-866-887-0015
- Seniors Safety Line 1-866-299-1011
- Trans Lifeline: 1-877-330-6366
- Canadian Human Trafficking Hotline Call: 1-833-900-1010L
- LGBT Youth Line: *Text:* 647-694-4275 / *Call:* 1-800-268-9688
- Canadian Association of Sexual Assault Centres Assaulted Women's Helpline
Toll Free: 1-866-863-0511 #SAFE (#7233) on Bell/Rogers/Fido/Telus mobile
TTY: 416-364-8762
www.awhl.org
- Français Fem'aide
Telephone Toll-Free: 1-877-336-2433 ATS: 1 866 860-7082
www.femaide.ca

ADDITIONAL RESOURCES

The following resources provide additional information and education on the topics of sexual violence, domestic violence, intimate partner violence, and child abuse.

- DAWN – DisAbled Women's Network <http://www.dawncanada.net/>
- METRAC – Action on Violence <http://www.metrac.org/>
- Ontario Women's Justice Network http://owjn.org/owjn_2009/home
- Rainbow Health Ontario <http://sherbourne.on.ca/lgbt-health/rainbow-health-ontario/>
- Community Legal Education Ontario www.cleo.on.ca
- White Ribbon Canada <http://www.whiteribbon.ca/>
- VAW Learning Network <http://www.vawlearningnetwork.ca>
- FORGE <http://forge-forward.org>
- Webbing With Wisdom <http://webwise.ca/>
- Toronto Police Services - Project Guide: A Guide for Sexual Assault Survivors <http://yourchoice.to/>

- Elder Abuse Ontario <http://www.elderabuseontario.com/>
- Canadian Human Trafficking Hotline <https://www.canadianhumantraffickinghotline.ca/>
- Neighbourhoods, Friends, and Families <https://www.neighboursfriendsandfamilies.ca/>
- Love is Respect: The National Dating Abuse Hotline <https://www.loveisrespect.org/>
- MaleSurvivor <https://malesurvivor.org/>

- Draw The Line <http://www.draw-the-line.ca/gethelp.html>