

Reforming the Alberta *Police Act**, *Police Service Regulation*, and Provincial *Policing Standards* to Better Respond to Sexual and Gender Harassment in the Workplace

JOINT SUBMISSION TO THE GOVERNMENT OF ALBERTA
FROM CALGARY POLICE SERVICE AND SHIFT: THE PROJECT
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Executive Summary

OVERVIEW

Alberta's *Police Act* (RSA 2000) has been under review since 2018 when the Government of Alberta undertook to amend or reform it along with the *Police Service Regulation*, and Alberta Provincial *Policing Standards*. In May and June 2021, Shift: The Project to End Domestic Violence at the University of Calgary (Shift/UCalgary) worked with the Calgary Police Service (CPS) to develop a joint submission focused on ways the *Police Act* could be amended or revised to equip policing organizations in Alberta to better address instances of workplace sexual and gender harassment that are below the criminal threshold. The report that follows outlines key, evidence-informed recommendations for the Government of Alberta.

In Canada, lifetime rates of sexual harassment in the workplace are estimated to be as high as 30%. While anyone can experience sexual or gender harassment, the research suggests that:

- Women experience sexual harassment more often than men do,
- People who identify as a sexual or gender minority experience more sexual harassment than heterosexual women do, and
- Women of colour experience more harassment overall (i.e., sexual, racial/ethnic or combination of both) than white women, white men, and men of colour.

PROBLEM

Workplace sexual and gender harassment is a serious issue in Canadian workplaces – one that is even more common among policing and paramilitary organizations. Despite the scope and seriousness of the issue, sexual and gender harassment in the workplace are not explicitly addressed in the current Alberta *Police Act*, *Police Service Regulation* (Regulation), or Provincial *Policing Standards* (*Policing Standards*). Instead, these types of harassment are addressed under broader sections of the *Police Act* related to “tyrannical behaviour,” “discreditable conduct,” and “insubordination,” which creates complexities for police organizations in trying to fulfill their employer responsibilities.

Moreover, because of overlap with the primary act in Alberta that addresses workplace rights and responsibilities – the Occupational Health and Safety (OHS) Act – the processes in the police service associated with complaints, investigations, and discipline is complex and confusing. Combined, these issues create barriers to implementing timely, trauma-informed, evidence-based responses to sexual and gender harassment in policing organizations in Alberta.

For the purposes of this report, all references to sexual and gender harassment specifically refer to 1) workplace harassment, and 2) harassment that is below the criminal threshold.

METHODS

The recommendations in this submission are based on a review of Canadian reports, peer reviewed articles, and grey literature focused on sexual and gender harassment in policing and paramilitary environments. (Note: Because the timelines for this submission were limited, the research team focused on key reports written in the last 10 years). Shift also conducted consultations with a variety of CPS members and departments, and with representatives from the Calgary Police Association and Calgary Senior Officer Association, Calgary Police Commission, Calgary Police Anti-Racist Action Committee, Calgary Sexual Assault Response Team (Alberta Health Service), Calgary Communities Against Sexual Abuse, Association of Alberta Sexual Assault Centres, Toronto Police Service, and Ottawa Police Service.

KEY FINDINGS ON THE ALBERTA POLICE ACT, REGULATION, AND POLICING STANDARDS

The key themes emerging from the academic research, policing and paramilitary reports, and consultations are briefly listed below. Further details (including citations) can be found in the body of the report.

Theme 1: Vague and Outdated Terms and Definitions — Definitions related to sexual and gender harassment and discrimination in policing legislation are narrow, vague, and not consistent with current standards. The research identifies a number of definitions (e.g., “fraternizing,” “hostile work environment”) that, if added, would create more clarity. Similarly, the language and terms used in the *Police Act* are sometimes problematic (e.g., pronouns are not inclusive of non-binary populations; the term “complainant” is problematic as it frames sexual harassment as something women complain about). (Note: We have used the term “complainant” throughout the report because that is the language that is currently used in law enforcement agencies in Alberta; however, we recommend exploring alternative terms so that this language can ultimately be phased out).

Theme 2: Lack of Clarity Around Processes and Accountabilities — Sexual and gender harassment complaints, investigations, and disciplinary processes are often misunderstood, hard to navigate, lack appropriate oversight/accountability, lack consistency in consequences, and take too long to resolve. As a result, it is often the harassed, as opposed to the harasser, who suffers consequences for reporting. Police organizations need clear direction on sanctions for those found culpable of workplace harassment, including direction on sanctions that deal with reprisals and retaliation, and are more likely to prompt changes in behaviour.

Theme 3: Roadblocks to Reporting — Both the research and the consultations highlighted the impact that fear of reprisals and retaliation have on raising concerns or making complaints about sexual and gender harassment. Fear of reprisals and retaliation is common, not just for those directly experiencing the harassment, but also for those witnessing the harassment and/or supporting the complainant. Victims and bystanders may face negative career consequences for reporting instances of sexual or gender harassment, ranging from belittling comments or labels (e.g., “not a team player” or “troublemaker”) to more serious consequences

such as not obtaining a hoped-for promotion or placement, not getting back-up on weapons calls, and being left at crime scenes.

Theme 4: Need for Better Data Collection and Evaluation Processes — There is very little data and evaluation on sexual and gender harassment from an intersectional analysis in law enforcement agencies in Canada. This submission outlines specific data requirements in this field ranging across the complaint, investigative, and disciplinary processes. Research suggests that it is also important to collect data on informal complaints, as well as on enquires about making a complaint. This is particularly important given that reporting rates are low in this area. For other types of data that should be collected, please see the list on page 12 in the report.

Theme 5: Benefits of External Civilian Oversight — Key reports from military and para-military organizations in Canada have shown that multiple challenges exist when internal bodies are responsible for handling the reporting and investigations of sexual and gender harassment in the workplace. Consequently, these reports recommend that an external, civilian body be responsible for handling enquires, investigations, and reporting. Research suggests the responsibilities of this body be extended to include prevention, coordination, monitoring of training, victim support, research, and data collection.

Theme 6: Need for Survivor-Centred and Trauma-Informed Approaches — Best practices in the area of sexual and gender harassment suggest that both people (e.g., investigators and supervisors) and processes need to be trauma-informed and survivor-centred. Trauma-informed people and processes involve realizing the widespread impact of trauma; understanding paths for recovery; integrating knowledge about trauma into policies, procedures and practices in an intentional way; and actively working to avoid re-traumatization. Survivor-centred approaches seek to empower the survivor by prioritizing their rights, needs, and wishes.

Theme 7: Need to Incorporate Restorative, Reparative, and Transformative Approaches into Response Models — Current processes are not working for victims of sexual and gender harassment in policing organizations. Research suggests that restorative and reparative justice approaches to these issues have better outcomes for individuals and organizations. Moreover, research has shown that many victims do not want their offenders to be harshly punished; rather, they want the offender to be held accountable, learn that their behaviour was wrong, and avoid repeating the behaviour.

Theme 8: Need for higher education and training standards — Research shows that having higher standards of education is an important consideration in relation to policing, as there are fewer incidences of race, gender, or sexual orientation-based discrimination when higher education standards are used for police. A recent review of the RCMP explicitly made the recommendation that a minimum of two-years post-secondary education be required for recruits to sign up and join, as the current requirements are well below standards found in other jurisdictions. It is important to acknowledge, however, that this standard creates a potential barrier for Indigenous peoples who are less likely to complete post-secondary education due to issues of colonialism and systemic racism.

Theme 9: The need to change workplace culture — Research and consultations confirmed a culture of misogyny, heteronormativity, and systemic racism that normalizes and reinforces sexual and gender harassment as tools to maintain the gender hierarchy in policing organizations. Hypermasculine culture is found across military, paramilitary, and policing organizations throughout Canada. One individual commented, “This type of behaviour is baked into the organization.” Overall, stakeholders felt that workplace culture and norm change approaches were necessary in order to prevent and address harassment in the workplace.

RECOMMENDATIONS FOR THE GOVERNMENT OF ALBERTA

Below, we outline nine recommendations emerging from the research and consultations, briefly describing the rationale for each. Further details and explanations can be found in the body of the report.

Refine Existing Legislative Tools to Address Sexual and Gender Harassment

Recommendation #1: That government make explicit in the reformed *Police Act* that law enforcement organizations use the *Alberta Occupational Health and Safety Act (OHS Act)* to address sexual and gender harassment in the workplace. (Note: While we recommend that workplace harassment under the criminal threshold be addressed under the *OHS Act*, we suggest that aspects of sexual and gender harassment still be explicitly addressed in the *Police Act* as per the recommendations that follow).

Rationale: The current *OHS Act* addresses sexual and gender harassment in the workplace – and the overlap between the two pieces of legislation can create issues related to process and timeliness. Given that the *OHS Act* is more practical, appropriate, and efficient, it follows that these matters should be exempted from the jurisdiction of the *Alberta Police Act* and allowed to be addressed within the existing OHS framework. The *OHS Act* would need to be amended to support this recommendation.

Create a Provincial Third Party, Civilian-led Organization for Oversight

Recommendation #2: That government create, maintain, and fund a provincial third party, civilian-led investigative body specifically focused on sexual and gender harassment in the workplace that is centred on principles associated with reparative, trauma-informed, and survivor-centred approaches. This body should be external to both government and law enforcement agencies and report back to the public and police agencies annually.

Rationale: Research clearly states that police should not investigate other police members when it comes to workplace harassment because of conflicts of interest. Establishing an external body comprised of professionals who are specialists in trauma-informed, reparative approaches to sexual and gender harassment helps to ensure that reports of harassment are handled in a timely and effective way. A third party also provides opportunities for ongoing follow up and support.

Revise Existing Definitions and Create a System to Keep Them Current

Recommendation #3: That government update and maintain the language in the Alberta *Police Act, Regulation and Policing Standards* by:

- Annually reviewing definitions against wording in federal and provincial public policies, case law in Canada, and relevant human rights codes
- Clearly articulating the expectations on conduct and behaviours related to preventing sexual and gender harassment in the workplace
- Making changes to relevant policy documents
- Informing law enforcement organizations on the wording changes
- Revising pronouns to “they/their”
- Exploring alternatives to the term “complainant”.

Rationale: Consultations with Alberta stakeholders, together with a review of Alberta’s *Police Act*, suggests that the definitions and terms outlined in the Act are vague and outdated. Clearer definitions would help to provide more clarity in implementing the Act.

Create More Clarity and Accountability

Recommendation #4: That government consult with police organizations, experts, and advocates to design provincial *Policing Standards* that outline clear, consistent, and appropriate consequences for sexual and gender harassment, ones that are more likely to support behaviour change and reduce workplace harassment in law enforcement organizations in Alberta.

Recommendation #5: That government mandate law enforcement organizations to have clear, evidence-based investigative standards and processes for workplace sexual and gender harassment that are trauma-informed and survivor-centred.

Rationale: Clarity of process, implications, expectations, and timeliness is critical to responding to sexual and gender harassment complaints. Law enforcement organizations need a complaint process that is simple, accessible, robust, and results in meaningful enforcement and accountability. Establishing a set timeline for processing complaints based on best practices helps to prevent further traumatization while promoting healing by ensuring a timely and efficient resolution of claims.

Address Data and Evaluation

Recommendation #6: That government mandate law enforcement organizations to:

- Develop information systems that include a common typology and standards that are intersectional to ensure consistent data collection and evaluation on workplace harassment.
- Ensure that this data is reported annually to government and the public.

Rationale: Accountability, transparency, and understanding the scope of the problem is dependent upon good information. Without accurate data and quality evaluation from an

intersectional approach, it is difficult to assess the effectiveness of policies and practices designed to address sexual and gender harassment.

Expand Education Requirements

Recommendation #7: That government explore ways of expanding education, experience and personnel qualities and requirements for police recruits in ways that do not adversely affect Indigenous and other marginalized populations.

Rationale: Higher levels of education are associated with lower rates of police misconduct and discrimination. However, if educational standards are implemented rigidly, they might impact populations who have not pursued higher education due to factors related to colonialism and systemic racism.

Expand Training Protocols for Alberta Serious Incident Response Team

Recommendation #8: That government mandate reparative, trauma-informed, and survivor-centred training for employees on the Alberta Serious Incident Response Team.

Rationale: The research is clear: best practices include a trauma-informed, survivor-centred approach when dealing with complaints of sexual and gender harassment below the criminal threshold. Survivor-centred approaches offer complainants choice and voice in investigative and disciplinary processes – and the research suggests that many would prefer to resolve issues of sexual and gender harassment by drawing on reparative justice approaches versus punitive approaches (which often result in reprisals and are not overly effective in changing behaviour).

Integrate an Intersectional Analysis into the Alberta Provincial Policing Standards

Recommendation #9: That government apply an intersectional analysis on *Policing Standards* to ensure equity and inclusion across all law enforcement organizations.

Rationale: Research shows that women experience sexual harassment more often than men do, people who identify as a sexual or gender minority experience more sexual harassment than heterosexual women do, and women of colour experience more harassment overall (i.e., sexual, racial/ethnic or combination of both) than white women, white men, and men of colour. Better understanding the impacts of misogyny and systemic racism means recognizing their differential impacts on various groups of people. Auditing and reviewing the *Policing Standards* and integrating an intersectional and critical race theory will reduce sexism and racism in the workplace.

CONCLUSION

In sum, we believe these nine recommendations will strengthen the *Police Act*, *Police Service Regulation*, and Alberta Provincial *Policing Standards* by better equipping policing organizations to address workplace sexual and gender harassment that are below the criminal threshold. It is our hope that the adoption of these recommendations will facilitate healthy workplace dynamics and advance equity, inclusion, safety, and belonging within policing organizations across Alberta.

Introduction

In 2018, the Government of Alberta started a process to amend or reform the *Alberta Police Act*, *Police Service Regulation* (Regulation), and *Provincial Policing Standards* (*Policing Standards*). In June 2021, the Government of Alberta will confirm whether they will be amending or reforming the *Police Act*. To this end, the provincial government has been consulting and accepting submissions from policing organizations and Albertans. Together with the Calgary Police Service (CPS), UCalgary's Shift formed a research team to add our voices to the government's call for submissions.

OUR JOINT SUBMISSION TO THE GOVERNMENT OF ALBERTA'S REVIEW OF THE ALBERTA *POLICE ACT*, *REGULATION* AND *POLICING STANDARDS* PROVIDES RECOMMENDATIONS FOR RESPONDING TO AND ADDRESSING SEXUAL AND GENDER HARASSMENT IN THE WORKPLACE THAT ARE BELOW THE CRIMINAL THRESHOLD.

This document presents a high-level overview of workplace harassment in Canada, explaining how it is defined and outlining the scope and nature of the problem. This overview includes a specific focus on sexual and gender harassment, particularly within military and policing environments in Canada. Overlapping pieces of legislation related to workplace sexual and gender harassment within the *Occupational Health and Safety Act* are explored in relation to the current *Alberta Police Act*.

Due to time constraints, the research team utilized findings from 10 recent reports related to sexual and gender harassment in military and policing organizations in Canada (e.g., RCMP and municipal police) to augment consultation findings. These reports were recommended by the CPS collaborators. The research team conducted consultations with seven external stakeholders (Calgary Police Commission, CPS Anti-Racist Action Committee, Calgary Police Association and Calgary Senior Officer Association, Calgary Sexual Assault Response Team (Alberta Health Services), Calgary Communities Against Sexual Abuse, Association of Alberta Sexual Assault Centres, three internal stakeholder groups (Human Resources, Respectful Workplace Office, Professional Standards Section), and representatives from two other policing organizations (Toronto Police Service and Ottawa Police Service). In addition, relevant documents and reports on workplace harassment and sexual and gender harassment and discrimination, combined with selected academic papers, were reviewed (Please see Appendix A for methods). Drawing on research and best practice principles in the area of sexual and gender harassment in the workplace, the research team developed nine recommendations for changes to the *Alberta Police Act*, *Regulation* and *Policing Standards*.

This report has been significantly shaped by both feminist and anti-oppressive values and approaches, as well as by complementary theories associated with advancing equity and justice. More specifically, we apply an intersectional framework that helps to identify the ways in which various forms of inequality and intersecting systems of power relations set the stage for social inequalities and, as a result, inform individual realities and lived experiences within the workplace. Intersectionality is a conceptual tool that is used to examine “the interlocking effects of race, class, gender, and sexuality, highlighting the ways in which categories of identity and structures of inequality are mutually constituted and defy separation into discrete categories of analysis”.¹

JOINT SUBMISSION

This report is jointly submitted by Shift: The Project to End Domestic Violence (Shift) and the Calgary Police Service (CPS). Situated in the Faculty of Social Work at the University of Calgary, Shift is focused on creating the social conditions necessary to promote gender equity and stop violence before it starts. We partner with other researchers and academics, policy makers, systems and institutions, community leaders, NGOs, community-based organizations, and collectives to design, implement, and evaluate effective primary prevention solutions.

In 2020, Shift partnered with the CPS to identify ways to strengthen workplace dynamics and social norms related to equity, inclusion, safety, and belonging. A key area of focus for our continued work together is on enhancing CPS's response to sexual and gender harassment within the workplace. As part of this work, Chief Constable Mark Neufeld approached Shift to develop a joint submission to support changes to the *Police Act* that could ensure a more adaptive approach to workplace sexual and gender harassment.

The Shift–CPS partnership helps to ensure that the recommendations outlined in this report are informed by the on-the-ground realities of policing and by best practices identified in the research literature and through consultation.

THE PROBLEM

Workplace sexual and gender harassment are serious issues in Canadian workplaces – issues that are even more common among policing and paramilitary organizations. Despite the scope and seriousness of the issue, gender and sexual harassment in the workplace are not explicitly addressed in the current Alberta *Police Act*.

WHAT IS HARASSMENT?

Harassment includes any behaviour that a reasonable person would find unwelcome, offensive, or harmful.² The Alberta Human Rights Act prohibits harassment and discrimination on the grounds of race, ancestry, place of origin, colour, religious beliefs, age, gender, sexual orientation, gender identity, gender expression, marital status, family status, physical disability, mental disability, or source of income.³ Factors to consider with respect to harassment include:⁴

- Severity and impropriety of the Act
- Single, one time incident or a series of incidences over a period of time
- Circumstances or context of the situation
- Whether the behaviour is prohibited by the Alberta Human Rights Act
- Whether the behaviour demeaned, belittled, or caused personal humiliation or embarrassment.

Some examples of harassment include:

- Making rude, degrading, or offensive remarks about someone's physical appearance, religion, sexual orientation, or cultural beliefs⁵
- Displaying sexist, racist, or other offensive pictures, posters, or electronic communications related to any of the prohibited grounds in the *Canadian Human Rights Act*⁶
- Isolating the person by no longer talking to them, or by denying or ignoring their presence⁷
- Threats, intimidation, or retaliation against a person for having expressed concern or made a complaint against unethical or illegal workplace behaviours.⁸

Workplace harassment constitutes a serious human rights violation, creating a negative impact on workers, employers, their families, and economies.⁹ Organizations and institutions across Canada have recognized the serious impacts of workplace harassment to organizational and worker health and well-being.¹⁰ Increased efforts by federal and provincial bodies to develop legislation and policy related to harassment prevention and intervention speaks to the high priority being placed on this complex issue.¹¹

Workplace harassment is a significant issue, affecting thousands of Canadians across a variety of organizations and sectors.¹² National survey data indicate that 19% of women and 13% of men aged 15–64 experienced at least one type of harassment in the workplace within the past 12 months (such as verbal abuse, being humiliated, or unwanted sexual attention or harassment).¹³

For policing in Alberta, that would translate to 713 women and 877 men per year who experience one type of harassment.**

SEXUAL AND GENDER HARASSMENT IN THE WORKPLACE

Despite progress, sexual and gender harassment in the workplace remains serious workplace issues,¹⁴ particularly for women, people with disabilities, members of visible minority groups, transgender people, gender non-conforming, and non-binary people. **Sexual harassment** is “a type of discrimination based on sex involving unwanted comments or behaviour that intimidate, offend, or humiliate another person.”¹⁵ **Gender harassment** is linked to sexual harassment, as it is behaviour that “reinforces heteronormative gender roles.”¹⁶ For example, treating a person badly because they don't fit stereotypical gender roles is a form of gender harassment. Gender-based harassment typically targets women and those who are

^{**}This calculation is based on Statistics Canada data for 2019. In Alberta, there were 6,747 males (5,960 full-time officers and 787 full-time civilian personnel) and 3,754 females (1,727 full-time officers and 2,027 full-time civilian personnel). See <https://www150.statcan.gc.ca/t1/tbl/en/tv.action?pid=3510007801>.

transgender, gender non-conforming, and non-binary, although it may also target men who do not perform or present in stereotypically masculine ways.¹⁷

When examining lifetime rates of sexual harassment in the workplace, one study led by Employment and Social Development Canada shows that 30% of survey respondents have, at one point, experienced sexual harassment in the workplace.¹⁸ It is important to note that not all women experience the same rates of sexual harassment. **Women of colour experience more harassment (i.e., sexual, racial/ethnic, or combination of both) overall than white women, white men, and men of colour.¹⁹ Furthermore, sexual and gender minority people also experience more sexual harassment than heterosexual women do** [emphasis added].²⁰

These numbers are unlikely to reflect actual rates as research suggests that sexual and gender harassment is often not reported.²¹ Under-reporting is related to several factors, one of which is the fear of reprisals or retaliation. Studies have shown that retaliation against victims who complain is a workplace reality.²² For example, a 2017 report into workplace harassment in the RCMP (Civilian Review [2017]) notes that fear of reprisal is a significant concern for victims of sexual harassment. According to the report, retaliation and reprisal are so significant that *in some cases, members reported incidents of reprisal that threatened both the safety of the member and the integrity of the investigation.*²³

Retaliation has long-term impacts. Victims who do end up filing harassment complaints are not only placed in less desirable jobs, but also experience worse physical and mental health than those victims who choose to keep quiet about their experiences.²⁴ **The reality is, victims who face retaliation typically quit well before the harassment complaint process is complete.**

The following are common characteristics of sexual and gender harassment and discrimination in the workplace:²⁵

- Women experience sexual harassment more often than men do²⁶
- Gender harassment is by far the most common type of sexual harassment²⁷
- Men are more likely than women to commit sexual harassment²⁸
- Co-workers and peers commit sexual harassment at almost the same rates as supervisors²⁹

One of the common myths about sexual and gender harassment is that they have to do with attraction or sexual desire.³⁰ Sexual and gender harassment have much more to do with power and socio-cultural norms connected with specific spaces, such as workplaces.³¹ Ultimately, sexual and gender harassment work to “define or re-assert gender, race, age, or class hierarchies” within workplaces in harmful ways.³² Sexual and gender harassment act as tools of power (e.g., access to work tasks and positions) and of privilege (e.g., who historically has been permitted into the organization).³³

COSTS OF SEXUAL AND GENDER HARASSMENT IN THE WORKPLACE

There are a number of negative impacts of sexual and gender harassment, experienced not only by individuals, but also by entire organizations. For individuals, there are professional impacts, such as declines in job satisfaction, productivity, and performance.³⁴ Personal impacts to well-being have also been identified, including onset of depression, anxiety, PTSD, and other mental and physical health consequences as a result of experiencing sexual and gender harassment.³⁵

Impacts of sexual and gender harassment on organizations include lower productivity, lower employee morale, higher turnover, and increased risks of liability for harm caused.³⁶ Ultimately, sexual and gender harassment cause a toxic workplace environment, impacting those who are harassed, those who observe the harassment, and those who are not direct witnesses.³⁷

Beyond the psychological and emotional impacts of sexual and gender harassment, there are financial implications for organizations. These costs can include litigation costs associated with harassment suits as well as medical and sick leave costs for victims. A 2019 Australian study on the economic costs of sexual harassment in the workplace found that each case of workplace sexual harassment represents four working days of lost output, resulting in \$2.6 billion in lost productivity in Australia each year.³⁸

PREVALENCE OF SEXUAL AND GENDER HARASSMENT IN MALE-DOMINATED WORKPLACES

In Canada, a 2014 federal study affirmed that “*sexual harassment is more prevalent in hierarchical, male-dominated cultures.*”³⁹ Military and paramilitary organizations (such as police and RCMP) are examples of hierarchical male-dominated cultures.⁴⁰ In the past decade, there have been numerous reports investigating the workplace climate and prevalence of sexual harassment. A landmark report into sexual misconduct and harassment in the Canadian Armed Forces (CAF) concludes that “there is an underlying sexualized culture in the CAF that is hostile to women and LGBTQ members,” which creates an environment that is more conducive to serious incidents of sexual harassment and assault.⁴¹ The Civilian Review (2017) points out that the RCMP has been struggling with the problem of workplace harassment, bullying, intimidation, and sexual harassment for decades. In 2020, another report on the RCMP and sexual harassment concludes that “harassment and gender-based discrimination in the RCMP has been a persistent problem and the cause of tremendous hardship.”⁴² The same report found that the RCMP constitutes a toxic workplace culture that tolerates “misogynistic and homophobic attitudes amongst its leaders and members.”⁴³

These issues are not just prevalent in the RCMP; they exist in other law enforcement organizations in Canada. Since research into police culture began many decades ago, studies have consistently identified the need to prove one’s masculinity as a consistent theme.⁴⁴ Masculine norms of behaviour are typically reinforced at multiple levels of the organization and throughout the socialization process across the career span.⁴⁵ This masculinized culture, combined with core values of solidarity and authoritarianism, discourages employees from speaking out about sexual and gender harassment.⁴⁶

Canadian research into the experiences of LGBTQ police officers suggests that while police culture has evolved over the past 20 years, it remains conservative, heterosexual, and hypermasculine.⁴⁷ Research released in early 2021 examining recruitment and retention of visible minority police officers in Canadian policing agencies found that officers still experience inappropriate jokes, racist attitudes, and a culture of "othering." For example, one research participant explained, "when I joined my last watch, they were all white and said, 'you are messing [with] our bright and white reputation.'"⁴⁸

While there have been attempts by police organizations across the country to develop policies and procedures to prevent and address sexual and gender harassment and discrimination within the workplace, cases continue to manifest that "suggest that these policies may not have had a substantive effect on changing workplace culture in law enforcement."⁴⁹ Research suggests a sobering finding – that sexual harassment may be difficult to prevent in male-dominated organizations like policing because of the deeply entrenched culture, norms, and values⁵⁰. For this reason, **efforts to combat sexual and gender harassment must go beyond policy and training interventions for individuals, and instead focus on a whole-organization approach that targets organizational norms, culture, and values.**⁵¹

Alberta Legislation Related To Sexual And Gender Harassment In The Workplace

Over the past decade, different aspects of employment regulation have started to hold employers accountable for failing to adequately address and stop allegations of sexual and gender harassment in the workplace. Although different agencies are beginning to address a portion of that work, gaps remain in addressing the overall issue of sexual and gender harassment in the workplace. In addition, there can be unintended conflicts if the various policies, regulations, and acts are not in alignment, as is the case with the *Alberta Police Act* and the *Occupational Health and Safety Act (OHS Act)*.

The research team notes that the *OHS Act* and OHS Code have a number of relevant sections and that in 2018, a significant piece of legislation about harassment (including sexual harassment) was added to the *OHS Act*. For this reason, the *Police Act* may not need to be amended as the *OHS Act* does address these specific issues. The *OHS Act* now recognizes that:

- An employer has responsibility to ensure that workers are not subjected to or participate in harassment or violence at the worksite (to the extent reasonably practicable) (s. 3(1)(c))
- Supervisors have a responsibility to ensure that none of the workers they supervise are subjected to or participate in harassment or violence at the worksite (to the extent reasonably practicable) (s. 4(a)(v))
- Workers must refrain from causing or participating in harassment or violence (s. 5(d))
- Harassment and violence are recognized as hazards (s. 389 of the OHS Code)
- An employer must have a preventative plan, policy, and procedures to address harassment and violence (s. 390, 390.1, 390.2, 390.3, 390.4, 390.5, and 390.6).
- Complaints alleging harassment or violence must be reported and investigated pursuant to s. 40(5) of the *OHS Act*, including:
 - Carry out an investigation into the circumstances surrounding the injury or incident
 - Prepare a report outlining the circumstances of the injury or incident and the corrective action, if any, undertaken to prevent a recurrence of the injury or incident
 - Ensure that a copy of the report is readily available and provided to an officer on demand.
- Section 390.5 of the OHS Code also includes some specific requirements for how an

investigation is handled:

- The policy must state that the employer will investigate any incidents of harassment and take corrective action to address the incidents
- An employer will not disclose the circumstances related to an incident of harassment or the names of the complainant, the person alleged to have committed the harassment, and any witnesses, except
 - i. where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident, or
 - ii. as required by law.

The *OHS Act* also provides a mechanism for an employee to refuse dangerous work (s. 35), which could be modified to apply to refusal to work because of sexual and gender harassment that is ongoing and not being addressed by an employer. The Act could also be amended to allow employees to file a complaint if discriminatory action (including retaliation) is taken against a worker who exercised their s. 35 rights (s. 36 of the *OHS Act*).

One of the key challenges of relying on the *OHS Act* to manage sexual and gender harassment is that the Alberta *Police Act* investigative and hearing processes do not align well with some of the underlying requirements in the *OHS Act*. Neither act includes a paramountcy clause that would allow one act to take precedence over the other whenever police officers are alleged to have engaged in sexual or gender workplace harassment. Without a paramountcy clause, both acts apply, creating several challenges.

1. The OHS Code stipulates that corrective actions must flow from a finding of harassment. Corrective actions are not defined or legislated, which leaves employers to use their workplace discipline process for any sanctions. Because of the *Police Act*, this means that if *discipline* (including warnings and reprimands) is considered a possible corrective action for a police officer engaging in sexual harassment, there must be an investigation that meets *Police Act* requirements. Otherwise, the police service runs the risk of having a complaint of “disguised discipline” filed against it by the officer.
2. Further, the OHS investigation report cannot be used in any *proceeding or action*, which are both very broadly defined. While this protection has value and helps to encourage participation, it means that an OHS investigation report cannot be used in a *Police Act* process and will need to be repeated unless the *Police Act* investigation proceeds first and is then adopted as the OHS investigation. Multiple investigations are problematic for many reasons including the fact that they can result in inconsistent findings and subject complainants to further trauma by repeatedly having to participate.
3. The OHS Code is also designed to protect the confidentiality of individuals who participate in the investigative process unless necessary to advance the investigation or as required by law. In contrast, the *Police Act* requires some investigations to go on to a hearing, which

could be made public and open to the entire workplace, public, and media – something that the complainant might wish to avoid. The hearing also delays the conclusion of the process and can have a negative impact on complainants because the process becomes very legalistic.

4. Pursuant to the Alberta *Police Act*, if the matter is deemed serious and meets the legal threshold established through caselaw, then the matter must proceed to a hearing. If the matter is deemed not serious, then there are limited sanctions that can be imposed if the allegations are sustained, and many of those require the responding officer's consent.
5. The hearing is heard by either a retired or serving police officer (higher rank than the subject officer) or a retired Court of Queen's Bench of Alberta justice or provincial court justice. These categories of individuals make good sense when considering the typical nature of police misconduct and the expertise they bring to adjudicating those matters. However, none of those categories of individuals has any particular expertise with respect to matters of workplace sexual or gender harassment.

The *OHS Act* and the labour grievance process have a framework to address sexual and gender harassment within the workplace. Given this, it may be more practical, appropriate, and efficient to exempt these matters from the jurisdiction of the *Police Act* and enable them to be addressed within the existing OHS framework (versus attempting to navigate how the *Police Act* overlays that framework). Alternatively, if these matters proceed under the *Police Act*, then a simplified procedure for disposing of complaints for all but the most egregious allegations, for example, where dismissal or demotion is the penalty sought is necessary.

Document Review

This section presents findings from a review of reports on sexual and gender harassment in military and law enforcement organizations in Canada. Three reports are internal to CPS, and seven are external; the 10 reports were identified by the Calgary Police Service Project Team. Two reports specifically address harassment in federal settings, and one focuses on a broader organizational diversity audit. (For a list of reports, please see Appendix B). Based on analysis, nine themes emerged.

**THEME 1:
Vague and
Outdated Terms
and Definitions**

Definitions in policing legislation related to sexual and gender harassment and discrimination are often too narrow and vague and do not keep up with current standards.

**THEME 2:
Lack of Clarity
Around Processes
and Accountabilities**

Sexual and gender harassment complaints, investigations, and disciplinary processes are often misunderstood, hard to navigate, and lack appropriate oversight, accountability, and consistency in consequences.

**THEME 3:
Roadblocks
to Reporting**

Fear of reprisals and retaliation leave victims and bystanders feeling helpless in addressing and reporting instances of sexual and gender harassment.

**THEME 4:
Need for Better
Intersectional Data
Collection and
Evaluation Processes**

There is a lack of quality data from an intersectional analysis and little evaluation on impact.

**THEME 5:
Benefits
of External
Civilian Oversight**

External civilian oversight for reporting, investigation, accountability, and timeliness is key to reducing retaliation, increasing transparency and justice, and building trust and confidence in the process.

**THEME 6:
Need for Survivor-
Centred and Trauma-
Informed Approaches**

Trauma-informed and survivor-centred supports, programs, and targeted training must be integrated to respond and prevent sexual and gender harassment in the workplace.

**THEME 7:
Need to Incorporate
Restorative, Reparative,
and Transformative
Approaches into
Response Models**

Alternative justice models, outside of formalized processes, need to be available as an option to complainants.

**THEME 8:
Need for Higher
Education and
Training Standards**

Higher levels of education are associated with fewer incidences of discrimination and misconduct.

**THEME 9:
The Need to Change
Workplace Culture**

Efforts to combat sexual and gender harassment must go beyond policy and training interventions for individuals, and instead focus on a whole-organization approach that targets organizational norms, culture, and values.

THEME 1: VAGUE AND OUTDATED TERMS AND DEFINITIONS

There is a need to revise terms and definitions related to sexual and gender harassment and discrimination.

All documents reviewed had recommendations pertaining to the development of definitions that needed to be included in various legislation and policy documents. Several identified the need for broad, inclusive definitions of sexual harassment and sexual assault. Other documents identified the need for additional definitions for terms such as:

- Adverse personal relationships
- Bystander intervention
- Consent
- Diversion
- Duty to report
- Equity
- Hazing
- Fraternalizing
- Healthy workplace
- Hostile work environment
- Inappropriate sexual conduct
- Inclusion
- Restorative justice
- Sexual assault
- Sexual misconduct

One report recommends that definitions on “equity,” “diversity,” and “inclusion” align with national and provincial human rights standards.⁵² The document also recommends that pronouns in all policies be changed from “he/she, him/her” to “they/their.” Further, using the terms “complainant” and “respondent” were identified as problematic because of the origins of the word “complainant” and the framing around women complaining. Exploring viable alternatives could be explored through consultations with advocates and researchers.

Two of the reviewed reports recommend that a definition for alternative justice processes be developed, and that restorative justice policies and models be focused on preventative procedures. Furthermore, the Report of the Third Independent Review recommends that there be collaboration to “develop a formalized restorative justice model that is adapted to the needs of victims and perpetrators and suited to the reality of the Canadian Armed Forces and its justice system.”⁵³

THEME 2: LACK OF CLARITY AROUND PROCESSES AND ACCOUNTABILITIES

Sexual and gender harassment complaints, investigations, and disciplinary processes are often misunderstood, hard to navigate, and often do not result in the accused being held accountable.

Most reports reviewed indicate that harassment complaints, investigations, and disciplinary

processes should be housed with a **civilian external oversight** entity. The majority also suggest that reporting processes need to be clear and simple for complainants to navigate. Explicit directions on responder roles and responsibilities should be developed using plain-language. Furthermore, several reports on military settings recommend that victims be offered the option to transfer the complaint to civilian authorities (e.g., outside the military justice system).

These reports focus on the investigation processes of a complaint. Several documents recommend that **clearly defined investigative standards should be developed to guide investigations into sexual and gender harassment disclosures**. For example, the Civilian Review (2017) suggests that members trained in criminal investigations are likely to utilize criminal investigative techniques in a harassment investigation, which they note to be an unsuitable approach.⁵⁴

While many reports indicate that specialized expertise is required to investigate and handle workplace harassment cases, there is little specific information describing such specialized expertise. However, one theme was consistent across multiple reports: skilled, competent, and dedicated administrative investigators should be conducting investigations. Furthermore, these individuals should not be sworn members. These individuals should be independent of the chain-of-command in order to effectively conduct harassment investigations.

Finally, in *Broken Dreams, Broken Lives: The Devastating Effects of Sexual Harassment on Women in the RCMP*, the Honourable Michel Bastarache, C.C. Q.C. as Independent Assessor (2020) outlines the kinds of sanction that should be put in place for those investigated and found to have perpetrated harassment, such as:

- Suspensions without pay for longer periods
- Demotions and/or removal of supervisory responsibilities for an extended period
- Ban on applying for promotions with no discretionary override for a specified period of time
- Outright dismissal from the force for serious or repeated offences

Further, investigations into sexual or gender harassment should be required to conclude, and compel participation, even if those accused retire or resign prior to the conclusion of the investigation. These recommended sanctions will need to align with any revisions to the current sanctions for discipline within the *Police Act* and take into account any labour relations or human resource implications for implementation.

THEME 3: ROADBLOCKS TO REPORTING

Fear of reprisals and retaliation leave victims and bystanders feeling helpless in addressing and reporting instances of sexual and gender harassment.

Many of the reports identify that reprisals and retaliation are significant issues when it comes to raising concerns and making complaints regarding sexual and gender harassment. For example, in Bastarache (2020), fear of reprisals is a prevailing theme, and the author concludes that “complaints are more detrimental to the victim than to the harasser.”⁵⁵

Fear of reprisals and retaliation is found to be prevalent not just for those directly experiencing the harassment, but also for those witnessing the harassment.⁵⁶ While there may be policies that specifically address retaliation, these policies may inadvertently increase the risk of reprisal for those who wish to bring forward concerns. For example, in *Civilian Review* (2017), the authors note that harassment policies and procedures include elements to address complaints of retaliation. These policies, however, do not extend to situations before a formal complaint is lodged. As noted, “...**there currently are no procedures to protect members and employees who experience retaliation after informally voicing a concern about workplace conflicts or concerns** [emphasis added].”⁵⁷

The accused and their peers/colleagues are not the only individuals likely to engage in acts of reprisals and retaliation; several reports note that victims and bystanders are also vulnerable to retaliation by managers and supervisors. The *External Review into Sexual Misconduct and Sexual Harassment in the Canadian Armed Forces* report (Deschamps 2015) identified that victims and bystanders may face negative career consequences for reporting instances of sexual harassment or sexual assault, ranging from belittling (e.g., not a team player or labelled a troublemaker) to more serious consequences such as not obtaining a hoped-for promotion or placement, or even being put in situations that threatened the safety of the individual (e.g., not getting backup on weapons calls and being left at crime scenes).⁵⁸

THEME 4: NEED FOR BETTER INTERSECTIONAL DATA COLLECTION AND EVALUATION PROCESSES

Information systems are lacking. Data and evaluation are needed to support change.

Specific data needs to be collected across the harassment complaint, investigative, and disciplinary processes. For example, in *Civilian Review* (2017), the authors state that while there is tracking of data on the processing of formal sexual and gender harassment complaints, there is no tracking of informal complaints or enquires into making a complaint. This means that no data is collected on the number of individuals coming forward to informally raise a concern or seek information about the complaint, investigative, and disciplinary processes. The report suggested that this failure to collect **enquiry data** is a missed opportunity related to gathering information on workplace harassment. Types of data that are important to collect include:

- Number of people who feel safe to make a report of sexual and gender harassment
- Number and type of sexual and gender harassment enquires
- Number of confirmed complaints received by week (i.e., weekly counts)
- Number and type of sexual and gender harassment complaints (e.g., sexual violence, sexual harassment, sexual orientation, harassment, discrimination, reprisal)
- Number of complaints with multiple issues (intersection of gender, race, etc.)
- Number of complaints not in scope
- Demographic data on complainant and harasser (e.g., gender, age, race, rank, and years of service)

- Complaint stage (e.g., number of complaints at initial intake, investigation, mediation, withdrawn, closed, timelines)
- Types of measures taken to restore workplace wellness
- Number of appeals

The issue of collecting demographic data is especially relevant to understanding sexual and gender harassment for visible and sexual minority individuals. In the reviewed reports, there is limited discussion on experiences specific to visible and sexual minority groups. Statistics Canada data and other research on the Canadian Armed forces suggests that visible and sexual minority groups experience higher rates of sexual and gender harassment than do members who are not affiliated with those identity groups.⁵⁹ Therefore, race-based and gender-based data needs to be collected to ensure that the unique experiences of these minority groups regarding workplace harassment are reflected in the research and information systems.

Several reports also recommend the need for ongoing evaluation of efforts to address sexual harassment within the workplace. For example, Civilian Review (2017) notes that despite the development of a case management system that had the capacity to collect relevant data, the lack of analysis and reporting meant that the effectiveness of initiatives could be neither assessed nor improved upon.⁶⁰ Benchmarks and advancements will be impeded without data, reporting, and evaluation systems and continuous improvement processes.

THEME 5: BENEFITS OF EXTERNAL CIVILIAN OVERSIGHT

External civilian oversight for reporting, investigation, accountability, and timeliness is key to transparency and justice.

Research clearly states that police should not investigate other police members when it comes to workplace harassment. All reports reviewed recommend that an external civilian body be appointed to handle reporting and investigations of sexual and gender harassment, as well as providing trauma-informed support and survivor-centred advocacy to victims. The reports discuss a variety of structures by which this could be achieved, such as (See Appendix B for reference):

- Establish a separate office with a mandate to monitor and coordinate decisions with respect to harassment complaints (Civilian Review, 2017)
- Use professionals outside the chain of command (*Third Independent Review of NDA*, 2021)
- Establish an organizational ombudsperson's position (*Report to Calgary Police Commission: Governance and Personnel*, 2017)
- Draw on external advisory councils (*Sexual Harassment and Violence in the Canadian Armed Forces*, 2019)

While a third party body external to all law enforcement agencies is the preferred approach, many of the suggested structures could be implemented with legislative amendments within police organizations to provide a local solution.

THEME 6: NEED FOR SURVIVOR-CENTRED AND TRAUMA-INFORMED APPROACHES

Trauma-informed and survivor-centred supports, programs, and targeted training must be integrated to respond to and prevent sexual and gender harassment in the workplace.

Best practices in the area of sexual and gender harassment suggest that people (e.g., investigators and supervisors) and processes need to be trauma-informed and survivor-centred. Trauma-informed people and processes involve:

- “Realizing the widespread impact of trauma
- Understanding paths for recovery
- Integrating knowledge about trauma into policies, procedures, and practices in an intentional way
- Actively working to avoid re-traumatization.”⁶¹

A trauma-informed approach supports a higher likelihood of complainants returning to work,⁶² being higher functioning while at work, and also may decrease the risk of a class action settlement, similar to which the RCMP has been forced to put into place.⁶³

A survivor-centred approach seeks to empower the survivor by prioritizing their rights, needs, and wishes and by offering them information, choice and control. **“It means ensuring survivors have access to appropriate, accessible and good quality services, including health care, psychological and social support, security, and legal services [emphasis added]”**.⁶⁴ Dignity and respect are essential to a survivor-centred approach, along with ensuring that complainants have the ability to choose a course of action in dealing with the violence, privacy, confidentiality, and non-discrimination.⁶⁵ The provision of comprehensive information is also key to helping complainants make their own decisions throughout the process.⁶⁶

THEME 7: INCORPORATE RESTORATIVE, REPARATIVE, AND TRANSFORMATIVE APPROACHES INTO RESPONSE MODELS

Victims of sexual and gender harassment want alternative approaches to reparations and healing.

Increasingly, research shows that victims of sexual and gender harassment want alternatives to formal discipline and/or justice system processes.⁶⁷ Restorative justice processes have been identified as a potential alternative. **Restorative justice can be defined as an alternative justice process focused on dialogue, accountability, healing, restitution, and restoration (if appropriate) of relationships harmed by violence.**⁶⁸ Restorative justice approaches provide victims the space to articulate their harm as they have experienced it.⁶⁹ Restorative justice approaches have been increasingly used to address harassment and violence in a variety of settings. For example, a restorative justice approach was used at a Canadian university to give female students who were the victims of sexual harassment an opportunity to identify the toxic culture that gave rise to their harassment, and openly call for steps to rectify that culture.⁷⁰ Research has identified positive outcomes with the use of restorative justice

approaches, such as reducing victim's fears of retaliation and helping victims to redefine their relationship with the offender.⁷¹

In the most recent independent review of the *National Defence Act*, Justice Fish found that some victims may be unwilling to report instances of sexual misconduct because they do not necessarily want the perpetrator to lose their job. The review recommends that not only should a restorative justice model be developed, but that amendments to the *National Defence Act* be made which would allow for restorative justice approaches in the military justice system.⁷²

Despite the positive benefits associated with restorative justice approaches, certain needs remain unmet, such as focusing too much on the rehabilitation of the offender while not focusing enough on restitution for the victim.⁷³ The concept of reparation may be more impactful, as reparation involves making amends for wrongdoing.⁷⁴ Reparation can include compensation and guarantees that the wrongdoing will not be repeated, as well as assurance that the victims feel satisfied with the reparation process.⁷⁵ Reparation focuses on the victim, including their procedural rights and their experiences of the justice process.⁷⁶

Transformative justice takes the process one step further by not only focusing on victim safety, healing, and sense of agency, but also seeking accountability and transformation of those who commit harassment and violence (by supporting perpetrators to understand the impact of their actions), while also focusing on transformation of the community, systems, and social conditions that create and perpetuate violence.⁷⁷

THEME 8: NEED FOR HIGHER EDUCATION AND TRAINING STANDARDS

Higher education is associated with lower rates of discrimination and misconduct. Training that is well designed can also help to reduce discrimination and harassment.

The Honourable Michel Bastarache (2020) identifies serious concerns about whom the RCMP is recruiting.⁷⁸ When he compared the educational requirements to become a member of RCMP (i.e., completion of secondary school or equivalent), he found them to be much lower than requirements in other jurisdictions. He recommends increasing the education minimum for entering the RCMP to at least two years of post-secondary education. He cites the examples of Sweden and Norway, which both require a minimum of two years post-secondary education and training. Having higher standards of education is an important consideration, as there is research to suggest there are fewer incidences of race, gender, or sexual orientation-based discrimination when higher education standards for police are implemented.⁷⁹

In addition to education requirements, the same report also recommends that anti-discrimination and harassment training be offered at the Depot (the training centre for RCMP recruits), and not just instituted once members are placed.⁸⁰ A note of caution regarding anti-discrimination and harassment trainings: despite the proliferation of diversity and harassment training initiatives, the reality is that most are not effective in reducing harassment or creating more hospitable work environments.⁸¹ A 2020 literature review on sexual harassment workplace trainings suggests that most training is “check the box” type training which is more focused on complying with legislative requirements than with seeking true change in the workplace.⁸²

In light of the evidence, the recommendations proposed by the research should be considered carefully. In two reports, the authors recommend training and workplace programs that focus on men and explore healthy masculinities. The design of such programs and trainings would need to be carefully thought out to ensure they are aligned with research and best practices. Evidence in this area suggests that programs should be structured around allyship and bystander behaviour, as opposed to identifying men as potential perpetrators.⁸³

Furthermore, research suggests that managers/leaders may require different training than the employees they supervise).⁸⁴ Many of the reports reviewed outline separate training needs for leaders. For example, in *Civilian Review* (2017), the authors recommend that Division Commanding Officers receive ongoing training on decision-making, particularly in relation to the assessment of workplace harassment complaints. This was in addition to the in-person harassment training conducted by trained and qualified experts that is offered on a regular basis to everyone. A couple of reports directly state that online training is not sufficient; trainings must be done face-to-face and be comprehensive.

THEME 9: THE NEED TO CHANGE WORKPLACE CULTURE

Efforts to combat sexual and gender harassment must go beyond policy and training interventions for individuals, and instead focus on a whole-organization approach that targets organizational norms, culture, and values.

Research and consultations confirmed a culture of misogyny, heteronormativity, and systemic racism that normalizes and reinforces sexual and gender harassment as tools to maintain the gender hierarchy in policing organizations. Hypermasculine culture is found across military, paramilitary, and policing organizations throughout Canada. One individual commented, "*This type of behaviour is baked into the organization.*" Overall, research suggests that culture and norm change approaches are necessary to re-build the organization and address harassment in the workplace.

Consultation Results

Between May 20 – June 17, 2021, the research team met with four external stakeholder groups (Calgary Police Commission, CPS Anti-Racist Action Committee, Calgary Police Association, and Calgary Senior Officer Association); three internal stakeholder groups (Human Resources, Respectful Workplace Office, Professional Standards Section); and representatives from two other policing organizations within Canada who were identified as having started the process of making changes related to sexual and gender harassment in the workplace (Toronto Police Service and Ottawa Police Service). The following themes emerged:

1. Misogyny, heteronormativity, and systemic racism contribute to the prevalence of sexual and gender harassment in policing organizations.

Congruent with research identifying the use of sexual and gender harassment as tools to maintain the gender hierarchy within policing organizations,⁸⁵ consultations with stakeholder groups pointed to the way in which a culture of misogyny, heteronormativity, and systemic racism contributes to the prevalence of sexual and gender harassment in policing environments.

Stakeholders described that a hyper-masculine culture dominates military and paramilitary organizations across the country. They explained that there is a relationship between misogyny, heteronormativity and racism. In fact, many confirmed that diverse members face additional challenges in regards to race, culture and religious harassment.

Overall, stakeholders felt that culture and norm change approaches were necessary in order to re-build the system and address harassment in the workplace.

2. Fear of reprisals and retribution contributes to the silencing of sexual and gender harassment reports in the workplace.

Despite individuals recognizing the unhealthy culture stemming from hypermasculine attitudes and beliefs, fear of reprisals and retribution prevent not only victims, but bystanders, from speaking up about sexual and gender harassment. A few explained that sometimes, the reprisals or retribution are subtle, making it hard for the complainant to prove there is any backlash occurring. One stakeholder called this behaviour “passive discipline”. They described it as a form of retaliation that shows up as microaggressions targeting the person that makes the complaint. They described that this form of harassment is often passive/aggressive behaviour that is super hard to prove.

Whether reprisals or retribution are active or passive, both are harmful. As mentioned in the research, reprisals and retaliation have long-term negative impacts on victims, bystanders, and the overall health of the organization.⁸⁶

Another dynamic raised by one policing organization was the number of employee relationships within the workplace. The stakeholder stated, “40% of our employees are married or in relationship with another employee.” The stakeholder explained that this dynamic further complicates the reporting and investigative processes.

3. Definitions related to sexual and gender harassment are often outdated and not well-defined or understood with the *Police Act* and workplace.

Reinforcing the findings from the review of 10 paramilitary, military, and CPS reports reviewed, stakeholders pointed to the challenges with definitions. As stated by one stakeholder, “*There is no mechanism to stay current with changes to definitions.*” Respondents also indicated that definitions of sexual and gender harassment are still unclear.

Some individuals felt that the broad language currently used in the *Police Act*, such as *misconduct of an officer*, creates limitations in how to respond, particularly in the ability to shift the complainant to an alternate process within the workplace. Similarly, sexual and gender harassment is not specifically defined in the *Police Act*; thus investigators sometimes turn to the concept of *tyrannical behaviour* or *discreditable conduct*, or *insubordination*, all terms that are included in the *Police Service Regulation* to describe this behaviour, which may be inappropriate and interpreted subjectively.

Stakeholders pointed to the need for additional definitions to be considered and included in the *Police Act*, *Regulation* and *Policing Standards*, such as a definition on “fraternization.” This aligns with findings from the foundational reports reviewed which also note the need for definitions and policies around a greater range of behaviours in relation to sexual and gender harassment in the workplace.

4. Need for enhanced clarity, structure of reporting, investigative, and accountability processes and procedures.

Many stakeholders talked about the challenges related to the reporting, investigative, and accountability process and procedures related to sexual and gender harassment. Several barriers were identified, in terms of timelines and transparency. In regard to timelines, multiple stakeholders pointed to the length of time for the process to reach a resolution— up to two years in some cases. Some felt that the current process provides the respondent with an unfair advantage, in that they receive much of the information related to the claim, including evidence, prior to responding.

Stakeholders felt there needed to be a better way of helping people understand the process and implications involved in reporting workplace harassment. As described by one stakeholder, “*The process needs to be clearly defined – process, timelines, implications, expectations, and outcomes.*” Some stakeholders felt that a barrier to coming forward with a report was that the process was unknown or complainants are “participating in the unknown.” Stakeholders felt that individuals need to fully understand what options are available to them before they report.

Lack of offender accountability was noted by and often serves as an additional barrier to reporting instances of sexual and gender harassment in the workplace. Stakeholders felt that appropriate and consistent consequences for this type of behaviour is required. Multiple stakeholders referenced the need for alternate justice approaches that are survivor-centred and trauma-informed noting the Police Act is not trauma-informed or victim-centred. This corresponds to research suggesting that victims of sexual and gender harassment want alternatives to formal discipline.⁸⁷ Restorative, reparative, and transformative approaches are appropriate alternative justice models that give varying degrees of control back to the victim.⁸⁸ Being trauma-informed is especially important when dealing with workplace harassment issues.⁸⁹ Finally, a couple of stakeholders felt that ensuring victims have access to outside resources that understand the policing contexts (i.e., policies, procedures, roles, and responsibilities) but are at the same time separate from it (e.g., HR consultant, Workers' Resource Centre, Ombud's Office) were important to ensuring a robust survivor-centered and trauma-informed model.

5. There is a need for a civilian led-independent body handling reporting, investigations, and adjudication outside of the service.

In addition to the point of accessing external resources, stakeholders had much to say about the importance of an external, independent, and well-trained (trauma-informed, survivor-centred) group or entity to handle sexual and gender harassment reports and investigations. All stakeholders felt there needed to be a third party option in order to provide objectivity. Some stakeholders did refer to the existing processes and structures currently in place at CPS (i.e., having independence of process, having an external law firm to provide people information and options on workplace concerns), but felt that more could be done. For example, several stakeholders felt that there needed to be one central body handling all reports and investigations, in order to ensure some degree of consistency.

Stakeholders also suggested that additional adjustments be made to the current process, particularly around including trained civilians. The issue of who has power to make decisions and hold people accountable was prevalent throughout the consultations. For example, a department within one policing organization was designed to be an internal "third party" to handle reports and investigations— however some stakeholders commented that it was designed without any formal power. In addition to the lack of power, sworn officers were placed within the department which created further complications. As stated by one stakeholder, "*If it [a new structure] is going to be an independent investigative body, it cannot be staffed by officers.*"

Many stakeholder groups talked about the power that police chiefs have in the process, specifically in relation to the degree of unilateral power on decisions whether a claim is serious or not, and what the consequences will be as a result of that decision. They noted that there is significant variability among chiefs, with some taking sexual and gender harassment very seriously, and others dismissing or minimizing these types of complaints. This leaves the process vulnerable to inconsistencies.

One of the suggestions for providing a check and balance on the current process is for police chiefs to be held accountable by Police Commissions for how these types of complaints are handled.

6. More training needs to be provided to improve capacity in responding appropriately to sexual and gender harassment.

Overall, many stakeholders felt that more training was required to better respond to workplace harassment complaints and investigations. In addition, several stakeholders identified that the turnover in Professional Standards Section (PSS) within policing organizations is a barrier to consistency and ensuring timely investigations. The time required to bring new individuals up to speed can slow the process down.

Some stakeholders felt that more training within PSS on how to assess sexual or gender harassment complaint is warranted.

In addition, some stakeholders commented positively on the training their organization had already engaged in, suggesting it was well received by members of the organization. Good, comprehensive training is related to increased awareness and sensitivity to sexual and gender harassment.⁹⁰ Any training that is to be considered should be trauma-informed, evidence-based, and offered to members across the organization.⁹¹

Recommendations For The Government Of Alberta

Refine Existing Legislative Tools to Address Sexual and Gender Harassment

Recommendation #1: That government make explicit in the reformed *Police Act* that law enforcement organizations use the *Alberta Occupational Health and Safety Act* to address sexual and gender harassment in the workplace. (Note: While we recommend that workplace harassment under the criminal threshold be addressed under the *OHS Act*, we suggest that aspects of sexual and gender harassment still be explicitly addressed in the *Police Act* as per the recommendations that follow).

Rationale: The current *Occupational Health and Safety (OHS) Act* addresses sexual and gender harassment in the workplace – and the overlap between the two pieces of legislation can create issues related to timeliness and confusion. Given that the *OHS Act* is more practical, appropriate, and efficient, it follows that these matters should be exempted from the jurisdiction of the *Alberta Police Act* and allowed to be addressed within the existing OHS framework.

Create a Provincial Third Party, Civilian-led Organization for Oversight

Recommendation #2: That government create, maintain, and fund a provincial third party, *civilian*-led investigative body specifically focused on sexual and gender harassment in the workplace that is centred on principles associated with reparative, trauma-informed, and survivor-centred approaches. This body should be external to both government and law enforcement agencies and report back to the public and police agencies annually.

Rationale: Research clearly states that police should not investigate other police members when it comes to workplace harassment because of conflicts of interest. Establishing an external body comprised of professionals who are specialists in trauma-informed, reparative approaches to sexual and gender harassment helps to ensure that reports of harassment are handled in a timely and effective way. A third party also provides opportunities for ongoing follow up and support.

Revise Existing Definitions and Create a System to Keep Them Current

Recommendation #3: That government update and maintain the language in the *Alberta Police Act, Regulation and Policing Standards* by:

- Annually reviewing definitions against wording in federal and provincial public policies, case law in Canada, and relevant human rights codes
- Clearly articulating the expectations on conduct and behaviour related to preventing sexual and gender harassment in the workplace.
- Making changes to relevant policy documents

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- Informing law enforcement organizations on the wording changes
 - Revising pronouns to “they/their”
 - Exploring alternatives to the term “complainant.”

Rationale: Consultations with stakeholders, together with a review of Alberta’s *Police Act*, suggests that the definitions and terms outlined in the Act are vague and outdated. Clearer definitions would help to provide more clarity in implementing the Act.

Create More Clarity and Accountability

Recommendation #4: That government consult with police organizations, experts, and advocates to design provincial *Policing Standards* that outline clear, consistent, and appropriate consequences for sexual and gender harassment, ones that are more likely to support behaviour change and reduce workplace harassment in law enforcement organizations in Alberta.

Recommendation #5: That government mandate law enforcement organizations to have clear, evidence-based investigative standards and processes for workplace sexual and gender harassment that are trauma-informed and survivor-centred.

Rationale: Clarity of process, implications, expectations, and timeliness is critical to responding to sexual and gender harassment complaints. Law enforcement organizations need a complaint process that is simple, accessible, robust, and results in meaningful enforcement and accountability. Establishing a set timeline for processing complaints based on best practices helps to prevent further traumatization while promoting healing by ensuring a timely and efficient resolution of claims.

Address Data and Evaluation

Recommendation #6: That government mandate law enforcement organizations to:

- Develop information systems that include a common typology and standards that are intersectional to ensure consistent data collection and evaluation on workplace harassment.
- Ensure that this data is reported annually to government and the public.

Rationale: Accountability, transparency, and understanding the scope of the problem is dependent upon good information. Without accurate data and quality evaluation from an intersectional approach, it is difficult to assess the effectiveness of policies and practices designed to address sexual and gender harassment.

Expand Education Requirements

Recommendation #7: That government explore ways of expanding education, experience, personnel qualities and requirements for police recruits in ways that do not adversely affect Indigenous and other marginalized populations.

Rationale: Higher levels of education are associated with lower rates of police misconduct and discrimination. However, if educational standards are implemented rigidly, they might impact populations who have not pursued higher education due to factors related to colonialism and systemic racism.

Expand Training Protocols for Alberta Serious Incident Response Team

Recommendation #8: That government mandate reparative, trauma-informed, and survivor-centred training for employees on the Alberta Serious Incident Response Team.

Rationale: The research is clear: best practices include a trauma-informed, survivor-centred approach when dealing with complaints of sexual and gender harassment below the criminal threshold. Survivor-centred approaches offer complainants choice and voice in investigative and disciplinary processes – and the research suggests that many would prefer to resolve issues of sexual and gender harassment by drawing on reparative justice approaches versus punitive approaches (which often result in reprisals and are not overly effective in changing behaviour).

Integrate an Intersectional Analysis into the Alberta Provincial Policing Standards

Recommendation #9: That government apply an intersectional analysis on *Policing Standards* to ensure equity and inclusion across all law enforcement organizations.

Rationale: Research shows that women experience sexual harassment more often than men do, people who identify as a sexual or gender minority experience more sexual harassment than heterosexual women do, and women of colour experience more harassment overall (i.e., sexual, racial/ethnic or combination of both) than white women, white men, and men of colour.^{92,93} Better understanding the impacts of misogyny and systemic racism means recognizing their differential impacts on various groups of people. Auditing and reviewing the *Policing Standards* and integrating an intersectional and critical race theory will reduce sexism and racism in the workplace.

CONCLUSION

Our research identified various areas of improvement, such as workplace culture, use of current definitions, development of appropriate reporting, investigation, and sanction processes, as well as approaches required to ensure complainants feel heard and are treated with dignity. We believe these nine recommendations will strengthen the *Police Act*, *Police Service Regulation*, and *Alberta Provincial Policing Standards* by better equipping policing organizations to address workplace sexual and gender harassment that is below the criminal threshold. It is our hope that the adoption of these recommendations will facilitate healthy workplace dynamics and advance equity, inclusion, safety, and belonging within policing across Alberta.

Appendix A: Methods

A document review and consultations with internal and external stakeholders informed the content of this report. Internal stakeholders were those from a variety of positions and departments across the CPS with knowledge and expertise in sexual and gender harassment issues at CPS (Human Resources, Respectful Workplace Organization, Provincial Standards Section). External stakeholders included individuals from the Calgary Police Commission, CPS Anti-Racist Action Committee, Calgary Sexual Assault Response Team (Alberta Health Service), Calgary Communities Against Sexual Abuse, Association of Alberta Sexual Assault Centres, Calgary Police Association, Toronto Police Service, and Ottawa Police Service. Relevant documents and reports on workplace harassment and sexual and gender harassment and discrimination were reviewed and results were then themed.

Selected academic papers were included as supplementary material to results from the document review and consultations. The search incorporated multiple academic databases (e.g., Academic Search Complete, Criminal Justice Abstracts, SocINDEX, and Urban Abstracts) as well as Google searches. Search results were restricted to English language articles that were published within the past decade (2010–present) and focused on Canadian law enforcement.

The search terms were developed based on their relevance to sexual and gender harassment and discrimination in policing workplaces. The search terms described in Table 1 were used across databases and search strings were combined using the Boolean operator “OR” and across strings using the Boolean operator “AND.” Table 1 summarizes the search terms used.

TABLE 1. SEARCH TERMS

Population	Geographic Focus	Issue
“Police” OR “Policing” OR “Law enforcement” OR “Police force”	“Canada” OR “Canadians” OR “Canadian”	“Sexual harassment AND the workplace” OR “Workplace harassment”

LIMITATIONS

There are several limitations to note. First, timelines surrounding the submission rendered a deeper, more comprehensive search and review of documents a challenge. Therefore, the research team made the decision to review key reports that had been released within in the last decade (Please see Appendix B for list). Second, the research team could only review materials that were available for review. There may be a great deal more documentation surrounding policing environments and sexual and gender harassment and discrimination that have not been made available for public review.

Appendix B:

List of Reports Reviewed

- Bastarache, M. 2020. Broken Dreams, Broken Lives: The Devastating Effects of Sexual Harassment on Women in the RCMP. Ottawa, ON. Retrieved from <https://www.rcmp-grc.gc.ca/en/final-report-implementation-merlo-davidson-settlement-agreement>
- Civilian Review and Complaints Commission for the RCMP. 2017. Report into Workplace Harassment in the RCMP. Ottawa, ON: Government of Canada. Retrieved from <https://www.crcc-ccetp.gc.ca/en/report-workplace-harassment-rcmp>
- Deschamps, M. 2015. External Review into Sexual Misconduct and Sexual Harassment in the Canadian Armed Forces. Retrieved from <https://www.canada.ca/en/department-national-defence/corporate/reports-publications/sexual-misbehaviour/external-review-2015.html>
- Diversity Leads. 2018. Gender Policy Audit: A Report to the Calgary Police Service. Calgary, AB.
- Employment and Social Development Canada. 2019. Women in the Workplace: How Employers Can Advance Equality and Diversity. Ottawa, ON: Author. Retrieved from [canada.ca/publiccentre-ESDC](https://www.canada.ca/publiccentre-ESDC)
- Fish, M.J. 2021. Report of the Third Independent Review Authority to the Minister of National Defence. Ottawa: Author. Retrieved from [https://s3.amazonaws.com/tld-documents.llnassets.com/0027000/27134/final%20report%20of%20ira%20to%20the%20minister%20of%20national%20defence%20\(pdf,%20english\).pdf](https://s3.amazonaws.com/tld-documents.llnassets.com/0027000/27134/final%20report%20of%20ira%20to%20the%20minister%20of%20national%20defence%20(pdf,%20english).pdf)
- LeBlanc, H. 2014. A Study on Sexual Harassment in the Federal Workplace. Report on the Standing Committee on the Status of Women. Ottawa, ON: Speaker of the House of Commons.
- Prowse, D.E. 2013. Workplace Review: Calgary Police Service. Calgary, AB.
- Report to Calgary Police Commission: Governance and Personnel. 2017. Proposal to Enhance Independence and Oversight of the CPS Workplace Conflict Resolution System.
- Standing Senate Committee on National Security and Defence. 2019. The Report of the Standing Senate Committee on National Security and Defence: Sexual Harassment and Violence in the Canadian Armed Forces. Senate, Ottawa, Canada. Retrieved from https://senCanada.ca/content/sen/committee/421/SECD/Reports/SECD_Report_harassment_May_19_e.pdf

Endnotes

1. Dill, B.T., & Kohlman, M.H. (2012). Intersectionality: A transformative paradigm in feminist theory and social justice. In S. N. Hesse-Biber (Ed.), *Handbook of feminist research: Theory and praxis* (2 ed., pp. 154-174). Thousand Oaks, CA: Sage, p. 154.
2. The Professional Institute of the Public Service of Canada (PIPSC), 2007, *The Pocket Guide on Harassment*. Author. Retrieved from <https://pipsc.ca/sites/default/files/2018-07/harassment.en.pdf>
3. Government of Alberta, 2021, *Your Rights and Responsibilities As An Employee*, Alberta Human Rights Commission website, Retrieved from https://albertahumanrights.ab.ca/employment/employee_info/Pages/employee_rights_and_responsibilities.aspx
4. PIPSC, 2007, *The Pocket Guide*.
5. Government of Canada, 2015, *Is It Harassment? A Tool to Guide Employees*. Retrieved from <https://www.canada.ca/en/government/publicservice/wellness-inclusion-diversity-public-service/harassment-conflict-resolution/harassment-tool-employees.html#c2>
6. PIPSC, 2007, *The Pocket Guide*.
7. Government of Canada, 2015, *Is It Harassment?*
8. PIPSC, 2007, *The Pocket Guide*.
9. CSA Group, 2019, *Preventing Violence and Harassment in Canadian Workplaces*. Toronto: Author. Retrieved from <https://www.csagroup.org/wp-content/uploads/CSA-Group-Research-Preventing-Violence-and-Harassment-in-Canadian-Workplaces.pdf>
10. CSA Group, 2019, *Preventing Violence*.
11. CSA Group, 2019, *Preventing Violence*.
12. CSA Group, 2019, *Preventing Violence*.
13. Statistics Canada, 2018, *Study: Harassment in Canadian Workplaces*, 2016. Catalogue No: 11-001-X. Ottawa: Author. Retrieved from <https://www150.statcan.gc.ca/n1/en/daily-quotidien/181217/dq181217b-eng.pdf?st=pjGAhTV>
14. CSA Group, 2019, *Preventing Violence; Standing Senate Committee on National Security and Defence, 2019, Sexual Harassment and Violence in the Canadian Armed Forces: The Report of the Standing Senate Committee on National Security and Defence*, Senate, Ottawa, Canada. Retrieved from https://sencanada.ca/content/sen/committee/421/SECD/Reports/SECD_Report_harassment_May_19_e.pdf
15. Learning Network, 2015, *Sexual and Gender Harassment*, London, Ontario: Centre for Research and Education on Violence Against Women and Children. http://www.vawlearningnetwork.ca/our-work/issuebased_newsletters/issue-13/index.html
16. Learning Network, 2015, *Sexual and Gender Harassment*.
17. M. Dhillon & N. Kang, 2020, *Gender-Based Violence and Harassment in the Workplace*. Retrieved from <https://www.heretohelp.bc.ca/visions/workplace-bullying-and-harassment-vol15/gender-based-violence-and-harassment-in-the-workplace>
18. Employment and Social Development Canada, 2017, *Harassment and Sexual Violence in the Workplace: Public Consultations*. Ottawa, ON: Government of Canada. Retrieved from <https://www.canada.ca/en/employment-social-development/services/health-safety/reports/workplace-harassment-sexual-violence.html>
19. S. Fotheringham, 2020, *Annotated Bibliography of Sexual Harassment Workplace Training*, Edmonton, AB: Association of Alberta Sexual Assault Services.
20. J.L. Couto, 2018, "Hearing Their Voices and Counting Them In: The Place of Canadian LGBTQ Police Officers in Police Culture," *Journal of Community Safety and Well-Being*, 3(3), 84-87.
21. S. de Léséleuc, 2004, *Criminal Victimization in the Workplace*. Canadian Centre for Justice Statistics: StatisticsCanada. www.statcan.gc.ca/pub/85f0033m/85f0033m2007013-eng.pdf
22. F. Dobbin, & A. Kalev, 2020, "Why Sexual Harassment Programs Backfire and What To Do About It," *Harvard Business Review*, 44-52.
23. *Civilian Review and Complaints Commission for the RCMP (Civilian Review)*, 2017, *Report into Workplace Harassment in the RCMP*, Ottawa, ON: Government of Canada. Retrieved from <https://www.crcc-ccetp.gc.ca/en/report-workplace-harassment-rcmp>
24. F. Dobbin, & A. Kalev, 2020, "Why Sexual Harassment Programs Backfire."
25. S. Fotheringham, 2020, *Annotated Bibliography*.
26. Employment and Social Development Canada, 2017; Statistics Canada, 2018, *Study: Harassment*.
27. Learning Network, 2015, *Sexual and Gender Harassment*.
28. S. Fotheringham, 2020. *Annotated Bibliography*.

29. Employment and Social Development Canada, 2017; S. Fotheringham, 2020, Annotated Bibliography.
30. N. Piestch, May 2015, "Sexual Harassment and Public Space," Learning Network Brief (27), London, Ontario: Learning Network, Centre for Research and Education on Violence Against Women and Children, <http://www.vawlearningnetwork.ca/>
31. Learning Network, 2015, Sexual and Gender Harassment; N. Piestch, May 2015, "Sexual Harassment."
32. N. Piestch, May 2015, "Sexual Harassment."
33. N. Piestch, May 2015, "Sexual Harassment."
34. S. Fotheringham, 2020, Annotated Bibliography.
35. S. Fotheringham, 2020, Annotated Bibliography; Learning Network, 2015, Sexual and Gender Harassment.
36. M. Dhillon & N. Kang, 2020, Gender-Based Violence.
37. M. Dhillon & N. Kang, 2020, Gender-Based Violence.
38. Deloitte, 2019, The Economic Costs of Sexual Harassment in the Workplace, Australia: Author. Retrieved from <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>
39. H. LeBlanc, 2014, A Study on Sexual Harassment in the Federal Workplace: Report on the Standing Committee on the Status of Women, Ottawa, ON: Speaker of the House of Commons, 25.
40. S. Fotheringham, 2020, Annotated Bibliography.
41. M. Deschamps, 2015, External Review into Sexual Misconduct and Sexual Harassment in the Canadian Armed Forces, Retrieved from <https://www.canada.ca/en/department-national-defence/corporate/reports-publications/sexual-misbehaviour/external-review-2015.html>
42. M. Bastarache, 2020, Broken Dreams, Broken Lives: The Devastating Effects of Sexual Harassment on Women in the RCMP, Ottawa, ON. Retrieved from <https://www.rcmp-grc.gc.ca/en/final-report-implementation-merlo-davidson-settlement-agreement>
43. M. Bastarache, 2020, Broken Dreams.
44. S.L. Rawski & A.L. Workman-Stork, 2018, "Masculinity Contest Cultures in Policing Organizations and Recommendations for Training Interventions," *Journal of Social Issues*, 74(3), 607-627. doi: 10.1111/josi.12286
45. S.L. Rawski & A.L. Workman-Stork, 2018, "Masculinity Contest."
46. R.B. McKay, 2014, "Confronting Workplace Bullying: Agency and Structure in the Royal Canadian Mounted Police," *Administration & Society*, 46(5), 548-572. doi: 10.1177/0095399713509245
47. J.L. Couto, 2018, "Hearing Their Voices."
48. C. Rigaux & J.B. Cunningham, 2021, "Enhancing Recruitment and Retention of Visible Minority Police Officers in Canadian Policing Agencies," *Policing and Society: An International Journal of Research and Policy*, 454-482.
49. Government of Manitoba, 2014.
50. S. Haas, G. Timmerman, M. Hönig, M. Zaagsma & I. Vanwesenbeeck, 2010, "The Impact of Sexual Harassment Policy in the Dutch Police Force," *Employee Responsibilities and Rights Journal*, 22, 311-323.
51. S.L. Rawski & A.L. Workman-Stork, 2018, "Masculinity Contest."
52. Civilian Review, 2017.
53. M.J. Fish, 2021, Report of the Third Independent Review Authority to the Minister of National Defence. Ottawa: Author, p. 152. Retrieved from [https://s3.amazonaws.com/tld-documents.lnassets.com/0027000/27134/final%20report%20of%20ira%20to%20the%20minister%20of%20national%20defence%20\(pdf,%20english\).pdf](https://s3.amazonaws.com/tld-documents.lnassets.com/0027000/27134/final%20report%20of%20ira%20to%20the%20minister%20of%20national%20defence%20(pdf,%20english).pdf)
54. Civilian Review, 2017.
55. M. Bastarache, 2020, Broken Dreams.
56. Civilian Review, 2017
57. Civilian Review, 2017. Pg 15
58. M. Bastarache, 2020, Broken Dreams; Civilian Review, 2017; M. Deschamps, 2015.
59. A. Cotter, 2018, Sexual Misconduct in the Canadian Armed Forces, Regular Force: 2018. Catalogue no. 85-603-X, Ottawa: Statistics Canada; S. Fotheringham, 2020, Annotated Bibliography.
60. Civilian Review, 2017
61. Bosk, E.A., Paris, R., Hanson, K.E., Ruisard, D., & Suchman, N.E. (2019). Innovations in child welfare interventions for caregivers with substance use disorders and their children. *Child and Youth Services Review*, 101, 99-112. doi: 10.1016/j.childyouth.2019.03.040.
62. Deloitte, 2019, The Economic Costs of Sexual Harassment in the Workplace, Australia: Author. Retrieved from <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economic-costs-sexual-harassment-workplace-240320.pdf>
63. See <https://www.cbc.ca/news/canada/calgary/rcmp-class-action-lawsuit-non-police-women-deadline-1.5805784>
64. UN Women, 2012, "Survivor-Centred Approach," Virtual Knowledge Centre to End Violence Against Women and Girls Website, <https://www.endvawnow.org/en/articles/1499-survivor-centred-approach.html>
65. UN Women, 2012.
66. UN Women, 2012.
67. D. Karp, J. Shackford-Bradley, R.J. Wilson & K.M. Williamsen, 2016, A Report on Promoting Restorative Initiatives for Sexual Misconduct on College Campuses (The Campus PRISM Project), New York: Skidmore College. Retrieved from https://www.skidmore.edu/campusrj/documents/Campus_PRISM_Report_2016.pdf; M.P. Koss, 2014, "The RESTORE Program of Restorative Justice for Sex Crimes: Vision, Process, and Outcomes," *Journal of Interpersonal*

- Violence, 29(9), 1623–1660. <https://doi.org/10.1177/0886260513511537>
68. S. Boutilier, & L. Wells, 2018, *The Case for Reparative and Transformative Justice Approaches to Sexual Violence in Canada: A Proposal to Pilot and Test New Approaches*, Calgary, AB.: The University of Calgary, Shift: The Project to End Domestic Violence. <http://hdl.handle.net/1880/109349>
 69. Boutilier, & Wells, 2018, *The Case*.
 70. Boutilier, & Wells, 2018, *The Case*; D. Karp, et al., 2016.
 71. Boutilier, & Wells, 2018, *The Case*; J.-A. M. Wemmers, 2017, "Judging Victims: Restorative Choices for Victims of Sexual Violence," *Victims of Crime Research Digest*, 10: 12–17, Ottawa, Canada: Department of Justice, Canada.
 72. M.J. Fish, 2021, *Report of the Third Review*.
 73. Boutilier, & Wells, 2018, *The Case*; M. Koss, & M. Achilles, 2008, "Restorative Justice Responses to Sexual Assault," *Applied Research Forum*: 1–15, National Online Resource Center on Violence Against Women, Retrieved from http://vawnet.org/sites/default/files/materials/files/2016-09/AR_RestorativeJustice.pdf
 74. Boutilier, & Wells, 2018, *The Case*; Wemmers, 2017.
 75. Boutilier, & Wells, 2018, *The Case*.
 76. Boutilier, & Wells, 2018, *The Case*.
 77. Boutilier, & Wells, 2018, *The Case*; Gen5, 2017, *Ending Child Sexual Abuse: A Transformative Justice Handbook*, pp. 1–68, Retrieved from <http://www.generationfive.org/wp-content/uploads/2017/06/Transformative-Justice-Handbook.pdf>
 78. M. Bastarache, 2020, *Broken Dreams*.
 79. C. Paterson, 2011, "Adding Value? A Review of the International Literature on the Role of Higher Education in Police Training and Education," *Police Practice and Research*, 12(4), 286-297; R. Roberg, & S. Bonn, 2004, "Higher Education and Policing: Where Are We Now?" *Policing: An International Journal of Police Strategies and Management*, 27(4), 469-483. doi: 10.1108/13639510410566226
 80. M. Bastarache, 2020, *Broken Dreams*.
 81. F. Dobbin & A. Kalev, 2020, "Why Sexual Harassment Programs Backfire."
 82. S. Fotheringham, 2020, *Annotated Bibliography*.
 83. F. Dobbin & A. Kalev, 2020, "Why Sexual Harassment Programs Backfire"; S. Fotheringham, 2020.
 84. F. Dobbin & A. Kalev, 2020, "Why Sexual Harassment Programs Backfire"; S. Fotheringham, 2020, *Annotated Bibliography*.
 85. S.L. Rawski & A.L. Workman-Stork, 2018, "Masculinity Contest"; Steinþórsdóttir, F.S., & Pétursdóttir, G., M. (2017). Preserving Masculine Dominance in the Police Force with Gendered Bullying and Sexual Harassment. *Policing*, 12(2), 165-176.
 86. Dobbin, F., & Kalev, A. (2020). "Why Sexual Harassment Programs Backfire," 44-52.
 87. Boutilier, & Wells, 2018, *The Case*.
 88. Boutilier, & Wells, 2018, *The Case*.
 89. M.J. Fish, 2021, *Report of the Third Review*.
 90. S. Fotheringham, 2020, *Annotated Bibliography*.
 91. S. Fotheringham, 2020, *Annotated Bibliography*.
 92. S. Fotheringham, 2020, *Annotated Bibliography*.
 93. J.L. Couto, 2018, "Hearing Their Voices."

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JUNE 2021

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