

HR POLICIES

Human Rights, Inclusion and Equity Policy

Last Reviewed: June 2026

1 STATEMENT OF COMMITMENT

The Royal Conservatory of Music (RCM) is dedicated to creating an inclusive learning and working environment where every student, faculty member, staff member, and visitor feels safe, respected and supported. The Royal Conservatory of Music is committed to providing an environment free from any form of discrimination and harassment, in which all individuals are treated with respect and dignity, are able to reach their full potential, and have equal opportunities both in their working and learning environments. The Royal Conservatory of Music supports an environment where individuals are selected, taught, trained, assessed, appraised, promoted and otherwise treated in a manner that considers relevant merits and abilities.

The Royal Conservatory of Music prohibits discrimination, harassment, bullying, violence and any other form of conduct prohibited by the Ontario *Human Rights Code*, the *Ontario Health and Safety Act*, or any other applicable provincial legislation. The RCM has a zero-tolerance policy with regard to harassment of any kind within the RCM community.

To achieve this, The Royal Conservatory of Music is committed to ensuring equality, equity and inclusion throughout the RCM community and a comprehensive strategy to address harassment and discrimination, including:

- Equitable access to its services and resources;
- Promoting awareness of every individual's rights and responsibilities to support the goals of anti-racism, inclusion and equity;
- Regular monitoring of organizational systems for barriers based on *Code* and other grounds;
- Providing an effective and fair complaints procedure;
- Promoting appropriate standards of conduct at all times;
- Addressing all complaints filed, investigating complaints as appropriate and taking reasonable action when there is a finding of a breach of a policy.

This Policy applies to all members of the RCM community, including full-time, part-time and contract employees, contractors, consultants and volunteers.

2 DEFINITIONS

2.1 Anti-racism

A commitment to support a set of practices and systems designed to eliminate racism. Racism includes racist ideologies, prejudiced attitudes, discriminatory behaviours, structural arrangements and institutionalized practices resulting in racial inequality, as well as the false notion that discriminatory relations between groups are morally and scientifically justifiable.

2.2 Equality and Equity

Equality is treating individuals the same way to ensure they have equal access to opportunities and benefits at the RCM. Equity is treating individuals differently to take into consideration their individual needs and circumstances.

2.3 Duty to Accommodate

The duty to accommodate is a legal obligation for employers to enable employees and others in the workplace to take part in it equally and for service providers to enable individuals to benefit from its services. The duty to accommodate is provided up to the point of undue hardship.

2.4 Discrimination

The act of mistreating a person by imposing a burden or denying a benefit, privilege, or opportunity enjoyed by others, because of their race, disability, sex, family status or other protected ground covered by the *Human Rights Code* or other provincial statute.

Discrimination is usually based upon personal prejudices and stereotypical assumptions. It is not necessary to have an intent or motive to discriminate; it is sufficient to establish that conduct has a discriminatory effect. Discrimination can take many forms and can be direct, indirect, subtle or have an adverse effect. Actions, communications, rules, policies, procedures, requirements, qualifications or factors may not be directly or intentionally discriminatory but may nonetheless have an adverse effect and may result in creating barriers to achievement and opportunity.

2.5 Harassment

A single or course of vexatious conduct (including virtual or online conduct) that is known or ought reasonably to be known as unwelcome, including any improper behaviour directed at and/or offensive to another individual or group of individuals. This includes, but is not limited to, objectionable comments or conduct which demean, humiliate, bully, threaten or embarrass an individual and/or which are based on the following grounds, including any prohibited grounds pursuant to applicable provincial legislation: race, ancestry, place of origin, ethnic origin, colour, citizenship, creed (religion), age, sex, gender identity, gender expression, appearance, ability, sexual orientation, marital status, family status, political beliefs, economic status, disability, or any other ground covered by the *Code* or any applicable provincial legislation.

2.6 Sexual Harassment

A range of improper conduct or behaviours of a sexual nature, or based on sex, sexual orientation, gender identity or expression, or making unwelcome sexual solicitations by someone in a position of authority.

Examples of such behaviour include, but are not limited to:

- Unwanted or inappropriate touching
- Any communications (in-person, online, written or oral) with sexual overtones causing embarrassment or humiliation
- Inappropriate or unwelcome focus or comment on a person's physical characteristics or appearance, sexist jokes causing embarrassment or offence, or that are by their nature clearly embarrassing or offensive
- Leering
- Sexually degrading words used to describe a person
- Derogatory or degrading remarks or statements directed towards members of one sex or one's sexual orientation
- Sexually suggestive or obscene comments or gestures
- Unwelcome inquiries or comments about a person's sex life
- Unwelcome sexual flirtations, advances, or propositions
- Persistent unwanted contact or attention after the end of a consensual relationship
- Requests for sexual favours
- Verbal abuse or threats
- Sexual assault

2.7 Violence

The exercise of physical force by a person against another person that causes or could cause physical injury; an attempt to exercise physical force against a person, in the workplace, that could cause physical injury; or, a statement or behaviour that it is reasonable for a person to interpret as a threat to exercise physical force against another person in the workplace, that could cause physical injury. For more information on violence affecting employees of RCM, please see RCM's HR Policy on Workplace Violence.

2.8 Duty To Report

In Ontario, there is a statutory duty for every person who has reasonable grounds to suspect that a child is or may be in need of protection to report the suspicion and information upon which it is based to the local Children's Aid Society. This legal duty specifically applies to every person who

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performs professional or official duties with respect to children. A child is anyone who is younger than 18 years of age.

2.9 Reprisal

Any retaliatory action, penalty, or threat made by an employer against a worker, or by any member of the RCM community against another, for exercising or attempting to enforce their legal rights under any Code of Conduct or RCM Policy, or for participating in any investigation.

3 POLICY

3.1 Governance

The Royal Conservatory of Music is committed to achieving representation of the diversity of the Toronto community on its Board of Directors by ensuring that it has an equitable and transparent nominations process that is communicated to all members and that members are committed to outreach beyond the current membership if necessary to achieve this goal. The RCM will encourage representation from all qualified individuals.

3.2 Employment

The Royal Conservatory of Music is committed to the principles of anti-discrimination, anti-harassment, including sexual harassment, anti-violence, anti-racism, inclusion, equality and equity in employment. These principles will be consistently applied throughout the employment cycle. This includes recruitment, selection, staff development, performance evaluation, retention, promotion, discipline and termination.

3.3 Services

The Royal Conservatory of Music is committed to ensuring that its services and programs are delivered in a non-discriminatory manner and promoted to diverse communities. This involves an ongoing review of current outreach, communications, program planning and evaluation to ensure this goal is being met.

The Royal Conservatory of Music is committed to advertising and marketing its services in publications that serve diverse communities; by distributing promotional material and information to community-based organizations. Outreach programs in various venues and organizations, including schools and community centers, allow The Royal Conservatory of Music to reach a wide cross-section of the public.

In addition, The Royal Conservatory of Music will take into consideration the provision of services to disadvantaged individuals, low-income persons and families, by offering free concerts and other performances which are open to the public both at its premises on Bloor Street and in collaboration with other organizations. To accommodate individuals on limited income, The Royal Conservatory of Music strives to keep ticket prices at affordable rates and offers “rush” tickets to most concerts.

3.4 Training and Education

The Royal Conservatory of Music is committed to ensuring that those involved in the delivery of services and programs have the knowledge, understanding and skills to work with and provide services to individuals with different backgrounds, abilities, attributes, including ethnicity, race, colour, religion, age, gender, sexual orientation and to individuals with disabilities.

Training and education materials may be made available in English and French as well as other languages. The Royal Conservatory of Music will strive to engage front-line staff who represent diverse communities and reflect the cultural and linguistic milieu of Toronto.

3.5 Information and Communications

The Royal Conservatory of Music is committed to ensuring that all its communications, including information on its services and programs, are accessible to diverse communities.

4 HUMAN RIGHTS COMPLAINT PROCEDURE

4.1 Definitions

- i) **Complainant**
The individual alleging the discriminatory treatment or behaviour.
- ii) **Respondent**
The individual against whom the allegation of discrimination is made.
- iii) **Employee**
For the purpose of this Policy, Employee includes full-time, part-time and contract employees, volunteers, contractors and consultants working with the Royal Conservatory of Music.

4.2 Avenues of Complaint

A complainant may first choose to resolve the situation by telling the offender to stop the behaviour that is unwelcome or raise the issue directly with RCM administration. If this is unsuccessful or if the complainant chooses, the complainant may file a complaint as follows:

Oscar Peter School of Music

If a student or parent/guardian of a student wishes to make a report or file a complaint under this Policy or the applicable Oscar Peterson School Student and Parent Code of Conduct, a complaint should be made to the Dean at 416.408.2824 ext. 334, or the Human Resources Department at 416.408.2824 ext. 355 or hr@rcmusic.ca. Any concerns relating to the Dean should be made directly to the Human Resources Department. The Human Resources Department may consult with the Chief Administrative Officer. Where appropriate, the Chief Administrative Officer will consult with the Chair of the Board of Directors.

Phil & Eli Taylor Performance Academy for Young Artists

If a student or parent/guardian of a student wishes to make a report or file a complaint under this Policy or the applicable Taylor Academy Harassment and Discrimination Policy, a complaint or report should be made to The Taylor Academy's Assistant Director at ext. 330, or Human Resources Department at 416.408.2824 ext. 355 or hr@rcmusic.ca. include the HR generic e-mail inbox address. Any concerns relating to the Dean should be made directly to the Human Resources Department. The Human Resources Department may consult with the Chief Administrative Officer. Where appropriate, the Chief Administrative Officer will consult with the Chair of the Board of Directors.

Glenn Gould School

If a student wishes to make a report or file a complaint under The Glenn Gould School Student Code of Conduct or The Glenn Gould School Harassment and Violence Policy, they should follow the reporting steps and procedures under Sections 4.6 and 4.8 of the GGS Academic Calendar document. For all other concerns, reports or complaints that fall under this Policy, the student should make a complaint or report to the Human Resources Department.

Every complaint will be properly addressed. Where a complaint has been substantiated, appropriate disciplinary action will be taken with respect to employees, which may include termination of employment, and appropriate sanctions may be taken with respect to students, which may include expulsion.

4.3 Right to Complain

Members of the RCM community have the right to file a complaint or make a report in good faith about situations they genuinely believe to be discriminatory or harassing in nature. This Policy prohibits reprisal against individuals because they have reported, filed a complaint or have provided information regarding a complaint. Alleged reprisals shall be addressed as formal complaints and may be subject to the same consequences as complaints of harassment and/or

discrimination.

4.4 Reporting a Complaint

Although individuals may first choose to make a verbal complaint, a written report of the incident or issues raised will be required. The report should include the name of the Complaint, the names of individuals involved, including any witnesses and any persons to whom similar incidents may have been reported. Complaints should be reported as soon as possible and no more than four (4) months after the incident(s) or when the issue(s) first arose. An extension of this timeline may be extended in exceptional circumstances.

4.5 Threshold Assessment and Informal Resolution

Under the direction of the Chief Administrative Officer, the Human Resources department must receive and review the complaint filed and determine if an attempt to informally resolve the complaint or issues raised would be appropriate in the circumstances. Informal resolution attempts may be led by the Human Resources Department or by RCM administration within the relevant RCM school or in conjunction by both.

If an informal resolution is unsuccessful or deemed inappropriate, the Human Resources Department shall conduct a threshold assessment of the complaint. This assessment will look at whether the complaint made would amount to a breach of this Policy, assuming it is true. If the complaint does not meet the threshold assessment, the Human Resources Department will advise the Complainant of this assessment with reasons, in writing. If the Complaint filed passes the threshold assessment, the Human Resources Department will initiate an investigation by either assigning an investigator internally (either an individual in the Human Resources Department or a member of RCM administration) or retain a third-party investigator.

4.6 Investigation

After an investigator is assigned, the Chief Administrative Officer, or their designate, will notify any individual Respondent(s) and provide a summary of the allegations being against them. All Respondents have a right to respond to the allegations against them, while will be done in an interview with the investigator or if the Respondent chooses, in writing. Individuals named in the complaint as witnesses will be interviewed by the investigator.

4.7 Settlement and Mediation

With the consent of the Complainant and the Respondent, the investigator may attempt to mediate a resolution of the complaint at any point prior to or during an investigation. Every effort will be made to reach a resolution that is satisfactory to all parties involved.

4.8 Confidentiality

All individuals involved with a complaint must ensure the matter remains confidential. All records pertaining to a complaint and/or investigation will be marked "confidential" and kept separate from any other files that may exist for the individual(s).

4.9 Findings and Report

The investigator will prepare a report of their investigation. Once the investigation is complete, the investigator will prepare a written report summarizing the investigation findings, which will not identify the names of any witnesses. The standard of proof required for a determination that there has been a breach of the Policy will be "on a balance of probabilities", meaning that the investigator must find that it is more probable than not that a contested allegation is established as a fact, or not.

4.10 Final Decision

The Complainant and the respondent(s) shall each be provided with a copy of the summary of the investigator's report with reasons to support the decision regarding any outcomes.

This investigator's decision is final.

4.11 Sanctions

If it is determined that the Policy has been violated, the Chief Administrative Officer, in conjunction with the Vice President, Human Resources, or the Dean of an RCM school, as applicable, shall determine the appropriate sanctions or consequences for person(s) who have been found to have violated the Policy.

Possible sanctions to a finding of a breach of this Policy could include, but is not limited to:

- i) Requiring the respondent to provide a written apology
- ii) Giving a verbal or written reprimand with a copy to the Respondent's personnel file, if applicable
- iii) Suspension with or without pay
- iv) Dismissal of the Respondent
- v) Restriction of duties
- vi) Any sanction, restriction or consequence against a student, which may include the expulsion of the student from an RCM program

If a breach of the Policy is not found, The Royal Conservatory of Music may:

- i) Make a recommendation for training or better communications
- ii) Recommend that no further action is necessary

4.12 Misuse of Complaint Procedure

If there is a determination on a balance of probabilities that a complaint has been filed in bad faith, the complaint process may discontinue and disciplinary action against the complainant may occur.

4.13 Timeframe

Complaints should be reported as soon as possible and no more than four (4) months after the incident(s). This timeframe may be extended in exception circumstances. Depending on the complexity of the complaint, it should not take longer than 60 days. Investigations will be completed within a reasonable timeframe with a goal of completing it within 60 days of the filing of the complaint. If the report is not made within 60 days, an explanation of the delay should accompany the complaint. Complaints will be dealt with in a timely manner.

4.14 Records

All records will remain confidential. When remedial action requires discipline of an employee, a record of the disciplinary action will be placed in the individual's personnel file. All other records of the investigation will be kept separate and apart from the personnel file.

4.15 Administrative Bodies

This internal procedure is available to individuals of the RCM community to bring forth allegations of discrimination, harassment and other concerns as set out in this Policy to the RCM with a view to resolve them. In some circumstances, individuals of the RCM community have recourse to bring complaints forward to the applicable provincial tribunal or administrative body and nothing in this Policy denies or limits other avenues of redress available. Once any such formal complaint is filed, the internal process shall cease, if appropriate.

5 POLICY REVIEW

This policy is subject to ongoing review by the senior management and Board of Directors of The Royal Conservatory of Music and will be revised as necessitated by changes in legislation.

Policy review and revision date: **June 16, 2026.**