

June 2013

The Hon. Daniel Lang, Chair

The Hon. Roméo A. Dallaire, Deputy Chair

**CONDUCT BECOMING: WHY THE ROYAL
CANADIAN MOUNTED POLICE MUST
TRANSFORM ITS CULTURE**

Final report of the Standing Senate Committee on National
Security and Defence

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MEMBERSHIP

The Honourable Daniel Lang, *Chair*
The Honourable Roméo A. Dallaire, *Deputy Chair*

and

The Honourable Senators:

Larry Campbell
*James S. Cowan (or Claudette Tardif)
Joseph A. Day
*Marjory LeBreton, P.C. (or Claude Carignan)
Fabian Manning
Grant Mitchell
Pierre Claude Nolin
Dennis Glen Patterson
Donald Neil Plett

*Ex officio members

Other Senators who have participated from time to time on this study:

The Honourable Senators Boisvenu, Buth, Fortin-Duplessis, Moore, Munson, Wallin and White.

Clerk of the committee:
Josée Thérien

Administrative Assistant:
Monique Régimbald

Library of Parliament:
Holly Porteous, Analyst

ORDER OF REFERENCE

Extract of the *Journals of the Senate* on Thursday, Novembre 8, 2012:

Resuming debate on the motion of the Honourable Senator Mitchell, seconded by the Honourable Senator Day:

That the Standing Senate Committee on National Security and Defence be authorized to examine and report on harassment in the Royal Canadian Mounted Police; and

That the committee submit its final report no later than June 30, 2013.

After debate,

The question being put on the motion, it was adopted.

Gary W. O'Brien
Clerk of the Senate

INTRODUCTION

On 8 November 2012, the Senate authorized the Standing Committee on National Security and Defence (the “committee”) to examine harassment in the RCMP and report back on its findings no later than 30 June 2013.¹ Since then, the committee has received testimony² from numerous witnesses, all of whom provided valuable insights and advice on how the Royal Canadian Mounted Police (RCMP) can build a more respectful workplace, and address ongoing issues of harassment.³

Drawing from this testimony, the committee hereby offers a number of recommendations. The aim in drafting this report has been to assist the RCMP as it positions itself for continuous improvement. The committee intends to review the progress made in implementing its recommendations, as well as other programs and recommendations designed to address harassment in the workplace.

BACKGROUND

In Canada and around the world, the RCMP has a strong reputation, and the Force’s iconic red serge and Stetson hat are closely associated with Canadian identity and culture.

Steeped in a tradition tracing back to the foundations of Canadian history, the Royal Canadian Mounted Police has long enjoyed a respected place as one of this country’s icons. The RCMP has approximately 26,000 employees, and is unique in the world as a force providing national, provincial, and municipal policing services.⁴ Canadians have many reasons to be proud of the RCMP’s past and present accomplishments, and they have every reason to expect that RCMP members will live up to the force’s motto – “Maintiens le droit” or “Defending the law”.⁵

Recent findings and allegations regarding harassment in the workplace have had a serious effect on the Canadian public’s trust in the RCMP. For the purpose of this report, the committee uses Treasury Board Secretariat’s definition of harassment, which includes sexual harassment and bullying.

We have learned about instances of questionable conduct from internal RCMP studies and surveys that had been subsequently made public, as well as from witnesses who appeared before the committee.

¹ Senate, [Debates](#), 1st Session, 41st Parliament, 8 November 2012.

² Some of this testimony has been received through written submissions to the committee. Please see Appendix C.

³ See Appendix A.

⁴ Under its contract policing program, the RCMP provides provincial and community policing services in all provinces and territories in Canada, except Ontario and Quebec

⁵ Royal Canadian Mounted Police, [“Badges and Insignia.”](#)

The RCMP is currently facing lawsuits from men and women across the country who claim to have been harassed at work. This includes a potential class-action lawsuit against the RCMP in British Columbia.

Problems within the RCMP's internal culture have also been acknowledged by the Task Force on Governance and Cultural Change in the RCMP, created in 2007 by the Honourable Stockwell Day, Minister of Public Safety; by the RCMP's Reform Implementation Council, formed in 2008; and in the *Gender and Respect: The RCMP Action Plan*, released in 2013 ("*Gender and Respect Action Plan*").

Harassment was more specifically addressed by internal RCMP studies and surveys. This includes the RCMP "E" Division's *Summary Report on Gender Based Harassment and Respectful Workplace Consultations*. Its authors established focus groups made up almost exclusively of female RCMP members, to "provide an opportunity for employees to come forward and express their concerns and recommendations aimed at creating a safe and healthy work environment". The Report became public in September 2012. Participants generally agreed that "there is a serious issue of harassment in the RCMP" but that this problem is not "rampant".⁶

This conclusion was supported by other witnesses who appeared before the committee. Ian McPhail, Chair of the Commission for Public Complaints against the RCMP ("CPC"), noted that "empirical data presented to the commission did not support the widely held belief that the RCMP has a systemic issue with sexual harassment," but that "there is no proof to the contrary."⁷

The committee recognizes that, while there is no concrete statistical proof of a "systemic" or "rampant" problem of harassment in the RCMP, even a few cases of harassment can poison any work environment. In a written submission to the committee, Ms. Sherry Lee Benson Podolchuk, herself a former RCMP officer and victim of harassment at the hands of her colleagues noted that "unresolved conflicts poison the workplace and slowly create a toxic work environment". Frequent tales of retaliation against those who bring forward harassment complaints can also leave victims and bystanders feeling helpless to try to address the problem.⁸

In the end, one of the most important issues facing the RCMP is trust. Immediate, meaningful steps must be taken to enhance the public's trust in the Force, and bolster members' trust in the disciplinary systems designed to protect them. In the 2011 Public Service Employee Survey,

⁶ Royal Canadian Mounted Police, "E" Division, [*Summary Report on Gender Based Harassment and Respectful Workplace Consultations*](#), page 4.

⁷ Senate, Standing Committee on National Security and Defence, [*Evidence*](#), 1st Session, 41st Parliament, 25 February 2013.

⁸ Royal Canadian Mounted Police, "E" Division, *Summary Report on Gender Based Harassment and Respectful Workplace Consultations*, page 4.

“only 33% of RCMP employees, compared to 47% of Public Servants as a whole, agreed that “senior management will try to resolve concerns raised.”⁹

The recommendations proposed in this report are designed to ensure that all RCMP members and employees can be confident that the Force will strive to protect them from harassment and discrimination. Members and employees must be confident that they can speak out about harassment when they see or experience it, and that they will not be subject to punishment, recrimination, or retaliation.

The public reputation of the RCMP will be shaped by the attitudes and actions of the Force’s leadership. Over the coming years, the committee will continue to work with the RCMP as they strive to regain the confidence of Canadians and prepare to face the challenges of 21st century policing.

⁹ Royal Canadian Mounted Police, *Gender and Respect: The RCMP Action Plan*, p. 20.

LIST OF RECOMMENDATIONS

The committee recommends that:

- 1- The RCMP must undergo a cultural transformation paying particular attention to professional staff development of civilian and regular members. To inform its thinking on this issue, the RCMP should look to the Canadian Armed Forces' efforts at re-professionalization and it should seek out the best practices of other law enforcement agencies in Canada and abroad.
- 2- The Commissioner should define and implement a policy that holds senior management responsible for supporting victims of harassment and for implementing a *zero tolerance* policy through their words and deeds when it comes to managing harassment.
- 3- The sections of Bill C-42 that apply to harassment be implemented as soon as possible.
- 4- The RCMP fully implement those Commission for Public Complaints Against the RCMP recommendations that have been accepted by the Commissioner within a reasonable time and provide a justification for recommendations not accepted.
- 5- The RCMP establish an accurate baseline measure of harassment organization-wide by creating a confidential and truly comprehensive system of data collection on complaints (formal and informal), including how many of these complaints were dismissed, how many resulted in informal disciplinary measures and how many resulted in formal discipline. This data should be regularly updated and made publicly available through the Civilian Review and Complaints Commission.
- 6- Harassment be explicitly identified as part of the Code of Conduct through regulation.
- 7- The RCMP present the Code of Conduct in a separate document on its website so that Members and the public can easily access it.
- 8- Sanctions for contraventions of the Code of Conduct must be timely, proportionate, predictable and applied consistently throughout the RCMP, regardless of rank and insignia.
- 9- Any alleged violations of the Criminal Code be sent directly to the appropriate authorities as early as possible.
- 10- Promotion within the RCMP must take into consideration violations of the Code of Conduct, including past incidents of harassment.
- 11- The RCMP should not use transfers of either perpetrators or victims of harassment as a means of avoiding dealing with the underlying disciplinary issues.

12- The Minister of Public Safety should direct the Civilian Review and Complaints Commission to review the RCMP's implementation of harassment-related policies and programs and make recommendations to the Minister and the Commissioner on an ongoing basis.

13- The RCMP's *Gender and Respect Action Plan* be implemented as soon as possible.

14- The RCMP ensure that no member is promoted to a supervisory or management position prior to having completed harassment prevention training required for these new responsibilities.

15- The Government consider implementing a position of RCMP Ombudsman.

CULTURAL TRANSFORMATION

Ethics, integrity, and leadership play a significant role in any workplace environment. In a national police force which is seeking to modernize to meet the challenges of the 21st century, these values are more important than ever. The Standing Committee on National Security and Defence received evidence from numerous witnesses about the culture within the RCMP.

Referring to issues of harassment within the RCMP, including how they were handled, RCMP Commissioner, Bob Paulson noted:

This is not the RCMP that I joined. And this one cannot continue.¹⁰

The RCMP must undergo transformation if it is to address the serious concerns raised about harassment. It must address victims' concerns and do more to support them. Harassment does not just impact the organization, it has a direct impact on the lives of the victims and their families, be they regular members of the Force or civilian employees.

According to testimony heard at the committee, victims of harassment have been concerned about reporting incidents based on the culture within the RCMP. As the Commissioner rightly stated: "this cannot continue."

All organizations, particularly organizations like the RCMP that are modeled on a military command and control structure, look to their leadership to set the tone. The committee heard from witnesses that new laws or policies are only as effective as the people who enforce them. The RCMP has set a course and it is now time to ensure the entire organization follows. It is the actions of leaders – not policy manuals – that communicate the organization's ethics and ethos most forcefully. For there to be success, the committee urges senior leaders to ensure that the necessary and sometimes difficult cultural transformation takes place. The leadership must underscore the reality of that transformation by measuring change.

Equally important is the selection of appropriate metrics to measure harassment. The RCMP's *Gender and Respect Action Plan* indicates that progress in implementing early and timely resolution of workplace issues will be measured by an unspecified reduction in the number of formal complaints. As long as this hoped-for reduction in formal complaints is gauged against a commensurate increase in informal complaints that have been concluded in a timely manner and to the satisfaction of both parties, it is a reasonable and meaningful metric. What the committee does not want to see are complaints that should be handled through a formal process, to include possible criminal charges, being inappropriately disposed of through informal mechanisms. Sanctions for inappropriate behaviours must be commensurate with the harm these behaviours have caused.

¹⁰ Op-Ed, "[Root Out Sexual Harassment from the RCMP](#)," *The Globe and Mail*, 16 November 2011.

Equally pertinent to the utility of such metrics is that they reflect a uniform application of policies and regulations. If “E” Division in British Columbia is interpreting policies and regulations differently from “K” Division in Alberta or “C” Division in Quebec, the resulting metrics will be skewed and meaningless. To ensure a consistent and organization-wide approach to workplace conflict and harassment, the committee wishes to stress that well-crafted, unambiguous and continuously communicated policies and regulations are essential.

The committee also notes that an increase in complaints, formal or otherwise, may not necessarily be an indicator of failure. An organization that encourages its employees to challenge inappropriate behaviours should expect to see that offer being taken up. Over time, as the cultural change takes hold and RCMP members gain trust in the system and in their leadership, it is likely that any initial spike in complaints will level out or even decline.

The committee also heard from witnesses regarding cultural transformation processes that could be used as models for the RCMP’s own transformation. The committee heard from retired Lieutenant-Generals Andrew Leslie and Michael Jeffery. They discussed the process of cultural transformation and re-professionalization that has occurred in the Canadian Armed Forces over the past two decades. Elements of this process include: the development and publishing of a revised professional doctrine; the overhaul of the professional development system; increased educational requirements; greater disciplining in the process for professional advancement; an updating of the Code of Service Discipline; improvements to basic training; civilian oversight; and senior leaders’ unreserved acknowledgment of the past problems in the military. The experience of the Canadian Armed Forces could be instructional for the RCMP.

The committee acknowledges that, in a recent report by the CPC, out of ten selected Canadian police forces, the RCMP had the third lowest number of recorded harassment complaints.¹¹ The report also noted that “for a variety of definitional and methodological reasons, direct comparisons across the various police jurisdictions cannot easily be made. Among other factors, there appeared to be a high degree of variability in how workplace harassment was recorded and categorized by the different police agencies.”¹²

The committee believes that best practices from other Canadian police organizations could be successfully adopted by the RCMP. As an example, the committee heard testimony from Rick Hanson, Chief of the Calgary Police Service, who noted that his police organization has a psychological services section for members, an independent ombudsman, and an annual employee satisfaction survey.

¹¹ See Appendix B.

¹² Commission for Public Complaints Against the RCMP, [Public Interest Investigation Report into Issues of Workplace Harassment within the Royal Canadian Mounted Police](#), February 2013, p. 10.

For these reasons, the committee recommends that:

1. The RCMP must undergo a cultural transformation paying particular attention to professional staff development of civilian and regular members. To inform its thinking on this issue, the RCMP should look to the Canadian Armed Forces' efforts at re-professionalization and it should seek out the best practices of other law enforcement agencies in Canada and abroad.

2. The Commissioner should define and implement a policy that holds senior management responsible for supporting victims of harassment and for implementing a *zero tolerance* policy through their words and deeds when it comes to managing harassment.

IMPLEMENTATION OF BILL C-42

The Standing Committee on National Security and Defence heard repeatedly that Bill C-42, An Act to amend the Royal Canadian Mounted Police Act and to make related and consequential amendments to other Acts (hereafter, Bill C-42), is foundational to the RCMP's transformation. Not only does Bill C-42 empower the RCMP Commissioner to streamline the Force's existing complex disciplinary structure, it will also enable supervisors to confront and resolve workplace conflicts long before they escalate into truly damaging behaviours. Equally important are the Bill's provisions for the establishment of an independent Civilian Review and Complaints Commission, empowered to launch investigations of RCMP activities on its own initiative and compel the RCMP to produce documentation. This new, independent review body is designed to provide the enhanced accountability and transparency necessary to ensure that the Commissioner exercises these new authorities appropriately.

The committee notes that new rules aimed at punishing disgraceful behaviours are only a part of the action needed to effect change. Respectful behaviour must be internalized and seen as a normal condition of work, both between superiors and subordinates and among peers. Bill C-42 will give new powers to the Commissioner and senior officers in the RCMP to deal with harassment issues in a streamlined manner. These supervisors must be ready to implement the spirit of this legislation by protecting the rights of victims, and working proactively to deal with issues of harassment.

The committee recommends that:

3. The sections of Bill C-42 that apply to harassment be implemented as soon as possible.

RECOMMENDATIONS MADE BY THE COMMISSION FOR PUBLIC COMPLAINTS AGAINST THE RCMP

In its *Public Interest Investigation Report into Issues of Workplace Harassment within the Royal Canadian Mounted Police*, the CPC identified eleven recommended actions for the RCMP to undertake.¹³ To its credit, the RCMP tells us that it has implemented many of these recommended actions, including the establishment of centralized monitoring and coordination of its complaints process, with direct reporting to a senior executive outside of the divisional chain of command. The committee did not hear any specific indication that the RCMP's response to the CPC's first recommendation – that the RCMP implement a systematically compiled and nationally comparable system of data collection and reporting in respect of workplace conflict – would include data collection on both informal and formal complaints. We believe this comprehensive approach is essential.

Speaking before the committee, the CPC Chair, Mr. Ian McPhail, said,

Although the empirical data presented to the commission did not support the widely held belief that the RCMP has a systemic issue with sexual harassment, there is no proof to the contrary.¹⁴

Bearing this observation in mind, the committee recommends that:

4. The RCMP fully implement those Commission for Public Complaints Against the RCMP recommendations that have been accepted by the Commissioner within a reasonable time and provide a justification for recommendations not accepted.

The committee recognizes that data on formal and informal complaints offer only a partial picture of harassment in the RCMP. In his testimony before the committee, Commissioner Paulson noted that some work has already been done in the RCMP to have frank, open discussions with the members about their own experiences with harassment.

¹³ See Appendix E.

¹⁴ Senate, Standing Committee on National Security and Defence, *Evidence*, 1st Session, 41st Parliament, 25 February 2013.

The committee recommends that:

5. The RCMP establish an accurate baseline measure of harassment organization-wide by creating a confidential and truly comprehensive system of data collection on complaints (formal and informal), including how many of these complaints were dismissed, how many resulted in informal disciplinary measures and how many resulted in formal discipline. This data should be regularly updated and made publicly available through the Civilian Review and Complaints Commission.

That way, any assertions about progress on this issue can be made on the basis of a reliable and complete body of data.

At the same time, recognizing the fundamental difference between informal and formal harassment complaints cases – guilt is not formally established in an informal case – the committee urges the RCMP to exercise discretion in how it uses this data. It is better to consider informal complaints files in the aggregate and as part of an organization-wide trends analysis, rather than individually and as a means to suggest culpability in the context of a formal complaint.

CODE OF CONDUCT

Once Bill C-42 has come into force, the RCMP Commissioner will be in a position to promulgate new policies and regulations concerning the manner in which unacceptable workplace behaviours, such as harassment, will be addressed. The committee heard RCMP officials say that there remains some uncertainty as to whether the RCMP Code of Conduct, which is found in sections 38 to 58.7 of the *Royal Canadian Mounted Police Regulations, 1988*,¹⁵ will be revised to make explicit reference to harassment or if harassment will continue to be treated under the general rubric of “disgraceful conduct.”¹⁶

The committee believes it makes more sense to amend the Code of Conduct, section 48 which already addresses discrimination, to incorporate wording that defines and prohibits harassment. Testimony delivered to the committee indicates that ambiguous wording that is overly open to interpretation has contributed to inconsistent application of the Code of Conduct. Recognizing that the RCMP may still decide to define harassment in policy alone, the committee notes that, from a legal standpoint, a regulation carries more weight than a policy. Prohibiting harassment in a regulation conveys the seriousness accorded to this issue by the RCMP’s senior leadership. The committee recommends that:

¹⁵ See Part III, Discipline, Code of Conduct, [Royal Canadian Mounted Police Regulations](#), 1988 (SOR/88-361).

¹⁶ See comments made by Superintendent Michael O’Rielly, Director, Legislative Reform Initiative, Royal Canadian Mounted Police in Senate, Standing Committee on National Security and Defence, [Evidence](#), 1st Session, 41st Parliament, 18 March 2013.

6. Harassment be explicitly identified as part of the Code of Conduct through regulation.

Though the Code of Conduct is public, it is buried within a larger set of regulations. For purposes of publicizing the standards to which it holds itself and the consequences of contravening these standards, the committee believes that the Code of Conduct should be more accessible for members of the Force and the public. The committee therefore recommends that

7. The RCMP present the Code of Conduct in a separate document on its website so that Members and the public can easily access it.

The committee urges the RCMP to communicate on a regular basis what constitutes unacceptable behaviours and actions. As well, the committee seeks assurances that the RCMP will be equally clear in stipulating real consequences for those found to have acted in contravention of policy and regulations. In this latter connection, we have heard many instances of Code of Conduct violations being met by less than adequate punishments. If the RCMP is to effect a true culture change, this cannot continue.

The committee recommends that:

8. Sanctions for contraventions of the Code of Conduct must be timely, proportionate, predictable and applied consistently throughout the RCMP, regardless of rank and insignia.

9. Any alleged violations of the Criminal Code be sent directly to the appropriate authorities as early as possible.

10. Promotion within the RCMP must take into consideration violations of the Code of Conduct, including past incidents of harassment.

From the newly-sworn constable to the Commissioner, every uniformed member must be held to the same standard of conduct.

The committee has learned of instances where a member found to have engaged in repeated instances of sexual misconduct was transferred to an unsuspecting division. It has also heard stories of victims of harassment being removed from their units, ostensibly to protect them from retribution, as their harassment complaint was permitted to drag on. Neither of these scenarios is acceptable because neither addresses the underlying issues effectively.

While it is normal organizational practice to separate individuals in conflict, it is not acceptable to use this separation as a means to avoid prompt and just resolution of the conflict. Now that Bill C-42 gives the Commissioner new authorities enabling expeditious handling of harassment

complaints and ensuring appropriate sanctions, including dismissal, are applied in such cases, these incidents must become a thing of the past. The committee recommends that:

11. The RCMP should not use transfers of either perpetrators or victims of harassment as a means of avoiding dealing with the underlying disciplinary issues.

INDEPENDENT CIVILIAN OVERSIGHT

The RCMP currently does not have an independent civilian review body that is tasked with broad oversight of RCMP policies and programs. Given the significant new changes that will take place in the coming years within the RCMP, an oversight function could provide valuable guidance to the Minister and the Commissioner. Such an oversight body would be able to evaluate the effectiveness of current RCMP policies, and could provide timely, independent recommendations regarding those policies. This additional level of independent review of all aspects of RCMP policy would help to reinforce efficiency and effectiveness in the Force.

The committee therefore recommends that:

12. The Minister of Public Safety should direct the Civilian Review and Complaints Commission to review the RCMP's implementation of harassment-related policies and programs and make recommendations to the Minister and the Commissioner on an ongoing basis.

THE RCMP'S GENDER AND RESPECT ACTION PLAN

The *Gender and Respect Action Plan*, issued in February 2013, identifies 37 measures the RCMP will undertake to create a respectful workplace. The plan will result in a new policy framework around conflict resolution and harassment prevention, key components of which will include the nation-wide roll-out of respectful workplace programs and the use of new authorities under Bill C-42 to enforce accountability and enable early and timely resolution of workplace issues. These are essential steps and the committee supports their rapid implementation.

It is also clear to the committee that the Commissioner intends this action plan to result in far more than a series of administrative changes. The *Gender and Respect Action Plan* signals a determination to change the face and outlook of the RCMP by recruiting more women and visible minorities on the basis of merit, establishing a fair and transparent promotion process, ensuring its officer corps is representative of those it is leading, creating a better work-life balance, and seeking to retain talented members.

The committee recommends that:

13. The RCMP's *Gender and Respect Action Plan* be implemented as soon as possible.

HARASSMENT PREVENTION TRAINING

The committee commends the RCMP on its efforts to deliver scenario-based harassment prevention training to cadets at "Depot" Division. We also note the Commissioner's stated intention in the *Gender and Respect Action Plan* to update the RCMP's Harassment in the Workplace training by December 2013 and to continue improving compliance with the Force's mandatory harassment training policy. As part of these harassment training programs, it would be helpful if members of the force, including cadets were to hear firsthand about the impact of harassment.

Given the pivotal role of supervisors, managers and senior leadership in changing the workplace culture, the committee recommends that:

14. The RCMP ensures that no member is promoted to a supervisory or management position prior to having completed harassment prevention training required for these new responsibilities.

CONSIDER THE IMPLEMENTATION OF AN RCMP OMBUDSMAN

Some witnesses who have appeared before the committee on this issue have advocated some form of independent representation for regular Members, be it a union or an association. Given that the Supreme Court of Canada is expected to rule on this matter in the coming months, the committee will not comment at this time on how RCMP regular Members should be represented.

Setting the representation issue aside, however, the committee has heard testimony which suggests that an independent ombudsman can serve a useful role in communicating issues affecting all members, on a confidential basis, to senior leadership. In so doing, the ombudsman position can provide a valuable mechanism for members of the lower ranks to step forward on issues of concern without fear of retribution and for senior management to take corrective action early on. Furthermore, the committee notes that the Calgary Police Service and the Canadian Armed Forces provide examples of an ombudsman office functioning in unionized and non-unionized command and control environments. Building upon the *Gender and Respect Action Plan* wherein it seeks to establish a confidential process for employees seeking advice and raising awareness of issues, the committee recommends that:

15. The Government consider implementing a position of RCMP Ombudsman.

GOING FORWARD

The committee intends to continue monitoring the implementation of Bill C-42, the *Gender and Respect Action Plan* and recommendations set out in this report and that of the CPC. Public Safety Canada and the RCMP should also be prepared to communicate directly with those victims of harassment who feel abandoned by the leadership and the system, as well as the general public.

The RCMP must not lose sight of the fact that enhancing the public's confidence will help the Force meet its goal of recruiting talent from a broad spectrum of Canadian society. Restoring this trust will also go a long way toward improving the morale of those in the RCMP who have shown bravery and dedication to public service.

Public communication should be backed up by real data. As indicated earlier in this report, increased numbers of harassment complaints may actually be a sign that things are improving. Officials must be prepared to provide the public with the best possible appraisal of what the numbers mean. In this connection, we hold out as an exemplar the RCMP's annual reports on its disciplinary regime.¹⁷ Compiled by the RCMP's Adjudicative Services Branch, these reports explain the RCMP's complex disciplinary framework and the context of statistics provided on formal and informal disciplinary actions taken during the year in review. Also useful are the report's inclusion of charts enabling multi-year trends analysis.

Publications of this nature, combined with other forms of fact-based interaction with the public, are a vital means of dispelling lingering doubts about the RCMP's commitment to transparency and change.

The committee believes that the RCMP should take seriously its "duty to accommodate" and do more to address the needs of victims of harassment, including those still suffering from operational stress injuries.

The RCMP must ensure the confidentiality of victims is protected, as well as those who report abusers.

Finally, the committee suggests that the RCMP develop a cost effective employee satisfaction survey, to ensure it is meeting the needs of its membership on an on-going basis.

¹⁷ See, for example, the most recent report, RCMP Adjudicative Services Branch, [2011–2012 Annual Report – Management of the RCMP Disciplinary Regime](#).

CONCLUSION

After the challenges the Force has faced in recent years, the Minister for Public Safety, the Commissioner and the entire RCMP leadership have been left with little margin for error in proactively addressing and resolving incidents of harassment in all its manifestations. The Commissioner has committed to providing regular and public updates on tangible progress made toward this change.

The committee has heard testimony that change has already begun and looks forward to following the RCMP's progress on this issue.

APPENDIX A: TREASURY BOARD SECRETARIAT'S DEFINITION OF "HARASSMENT"

Harassment¹⁸

improper conduct by an individual, that is directed at and offensive to another individual in the workplace, including at any event or any location related to work, and that the individual knew or ought reasonably to have known would cause offence or harm. It comprises objectionable act(s), comment(s) or display(s) that demean, belittle, or cause personal humiliation or embarrassment, and any act of intimidation or threat. It also includes harassment within the meaning of the Canadian Human Rights Act (i.e. based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability and pardoned conviction).

Harassment is normally a series of incidents but can be one severe incident which has a lasting impact on the individual.

¹⁸ [Treasury Board of Canada Secretariat, Policy on Harassment Prevention and Resolution](#), Appendix A – Definitions, 1 October 2012

APPENDIX B: REPORTED WORKPLACE HARASSMENT CASES IN SELECTED CANADIAN POLICE SERVICES, 2011¹⁹

Police Service	Rate per 100 Police Employees
Police Service A	2.1
Police Service B	1.2
Police Service C	0.67
Police Service D	0.66
Police Service E	0.30
Police Service F	0.19
RCMP	0.11
Police Service G	0.05
Police Service H	0.0
Police Service I	0.0

¹⁹ Commission for Public Complaints Against the RCMP, [Public Interest Investigation Report into Issues of Workplace Harassment within the Royal Canadian Mounted Police](#), 14 February 2013, p.9, Table 4.

APPENDIX C: WITNESSES AND WRITTEN SUBMISSIONS

February 25, 2013

Commission for the Public Complaints Against the RCMP

Ian McPhail, Interim Chair

Richard Evans, Senior Director, Operations

Lisa-Marie Inman, Director, Reviews and Investigations

March 4, 2013

RCMP External Review Committee

Catherine Ebbs, Chair

David Paradiso, Executive Director and Senior Counsel

March 18, 2013

Royal Canadian Mounted Police

Craig Callens, Deputy Commissioner, Commanding Officer "E" Division

Inspector Carol Bradley, Team Leader "E" Division, Respectful Workplace Program

Simmie Smith, Project Leader, Division Diversity Strategist, RCMP Pacific Region Headquarters "E" Division

Sharon Woodburn, Assistant Commissioner, Director General of Workforce Programs and Services

Dennis Watters, Chief Audit and Evaluation Executive

Daniel Dubeau, Deputy Commissioner, Chief Human Resources Officer

Roger Brown, Assistant Commissioner, Commanding Officer, "Depot" Division

Christine Hudy, Training Programs Evaluation and Support Curriculum Development "Depot" Division

Matthew Venneri, Acting Director, National Performance Programs, Learning and Development

Sergeant Richard Davis, Workplace Relations Services Directorate

Superintendent Michael O'Rielly, Director, Legislative Reform Initiative

May 27, 2013

Calgary Police Service

Richard Hanson, Chief

Mounted Police Association of Ontario

Peter Merrifield, President

June 3, 2013

As individuals

Andrew Leslie, Lieutenant-General (Ret'd)

Michael Jeffery, Lieutenant-General (Ret'd)

Royal Canadian Mounted Police

Bob Paulson, Commissioner

Written Submission

Sherry Lee Benson Podolchuk

APPENDIX E: RECOMMENDATIONS MADE BY THE COMMISSION FOR PUBLIC COMPLAINTS AGAINST THE RCMP

The following recommendations appeared in the CPC's *Public Interest Investigation Report into Issues of Workplace Harassment within the Royal Canadian Mounted Police*:

Recommendation No. 1: That the RCMP implement a systematically compiled and nationally comparable system of data collection and reporting in respect of workplace conflict.

Recommendation No. 2: That the RCMP institute centralized monitoring and coordination of the harassment complaint process, located at RCMP headquarters and reported directly to a senior executive outside the divisional chains of command.

Recommendation No. 3: That the centralized coordination function also be responsible for receiving complaints of retaliation, the procedure for which should be clearly delineated in the applicable policy.

Recommendation No. 4: That an external mechanism for review of harassment decisions be implemented.

Recommendation No. 5: That the RCMP's policy regarding fostering a respectful workplace be defined as equally applicable to precursors of harassment, such as workplace conflict, in order that its dispute resolution mechanisms may be accessed at an early stage.

Recommendation No. 6: That harassment investigators receive mandatory specialized training in respect of conducting investigations into workplace conflict and/or harassment prior to being tasked with such investigations.

Recommendation No. 7: That the RCMP develop clearly defined investigative standards specifically in respect of investigations into harassment and workplace conflict.

Recommendation No. 8: That the RCMP implement timelines for the treatment of harassment complaints, including for efforts at early resolution.

Recommendation No. 9: That all supervisors and managers, upon appointment, be required to complete a relevant training program addressing workplace conflict and harassment within a set time of assuming their responsibilities.

Recommendation No. 10: That the online training module, which should address workplace conflict including harassment, be delivered on a regular basis.

Recommendation No. 11: That the RCMP develop a comprehensive method of evaluation to ensure that changes are producing the desired effects, and that the results of such evaluation be regularly and publicly reported.