



PREVENTION AND RESOLUTION OF WORKPLACE HARASSMENT

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| Responsibility: | <i>Superintendent, Human Resource Services Senior Manager, Human Resource Services</i> |
| Legal References: | See Appendix A |
| Related References: | See Appendix A |
| Effective Date: | October, 2007 |
| Revisions: | <i>February, 2011</i> |
| Reviewed: | <i>January 2016</i> |

1. Preamble

- 1.1 The following procedure provides guidelines and expectations pertaining to the staff prevention and resolution of workplace harassment process.

2. Purpose

- 2.1 The Waterloo Region District School Board (the Board) is committed to providing a working and learning environment in which all individuals are treated with respect and dignity. The Board Harassment Policy (Board Policy 1004) and its associated procedure deal with Ontario Human Rights Code based complaints. It is further recognized that, beyond the provisions of the Ontario Human Rights Code, every individual has an equal right to learn and work in an environment that is free from workplace harassment.
- 2.2 Harassment in the workplace under the Occupational Health and Safety Act differs from harassment based on enumerated grounds under the Ontario Human Rights Code.
- 2.3 Workplace harassment under the Occupational Health and Safety Act is defined as "...engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome." It can take the form of intimidation and/or threats toward anyone for whom the Policy applies. **NOTE: Workplace harassment does not include the normal exercise of supervisory responsibilities, including direction, counseling and discipline when necessary.**
- 2.4 Workplace harassment in any aspect of employment is strictly prohibited.
- 2.5 This procedure is intended to establish and maintain respectful working and learning environments and to provide responsiveness to the damaging effects of workplace harassment. Procedures have been developed to ensure that workplace disputes attributed to harassment are dealt with expeditiously, using appropriate resources. Individual rights and responsibilities related to this procedure are outlined in Appendix B – Workplace Harassment Prevention and Resolution Rights and Responsibilities.
- 2.6 This procedure applies, wherever work-related functions take place, to all members of the Board community, including but not limited to trustees, employees, students, visitors such as,

parents and community members, volunteers, permit holders, contractors and employees of other organizations who work on or are invited onto Board property.

- 2.7 The Board is committed to developing and maintaining a program to implement this procedure with respect to workplace harassment, and to meeting the requirements of the *Occupational Health and Safety Act*.

3. Terms and Definitions

- 3.1 *Workplace Harassment* - Workplace Harassment is defined in the Occupational Health and Safety Act (OHSA) as “engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome”.
- 3.2 *Working and Learning Environment* - The working and learning environment is any place where employees perform work or work-related duties or functions. Schools and school related activities, such as extracurricular activities and excursions, comprise this environment, as do Board offices and facilities. Conferences and training sessions fall within the ambit of this procedure, as does communications delivered through the Board's courier system, fax, e-mail, phones and mailboxes.
- 3.3 *Employee* - The term “employee” under this procedure includes all persons employed by the Board.
- 3.4 *Complainant* - The term “complainant” under this procedure refers to any employee who believes that s/he is being harassed or discriminated against.
- 3.5 *Respondent* - The term “respondent” under this procedure refers to any member of the Board community, as identified in 2.6 above, who is accused of harassing or discriminatory behaviour.
- 3.6 *Standard of Proof* - A Standard of Proof is used to make judgments in legal proceedings. For purposes of this procedure, a civil standard of proof will be used; that is, proof on the balance of probabilities.

The “balance of probabilities” is a standard of proof, based upon the weighing of evidence to determine the most appropriate judgment. It is often distinguished from another standard of proof, “beyond a reasonable doubt”, used in the criminal justice system

This standard will be objective. It will not be sufficient for a complainant to prove that s/he found the alleged conduct unwelcome. The complainant must demonstrate that the conduct itself was workplace harassment, based on an objective assessment of that conduct (i.e. would another reasonable person in the same situation find the conduct to be harassment).

- 3.7 *Threshold Assessment* - A threshold assessment is an initial evaluation conducted by the appropriate Human Resources Manager (or designate), which is used to determine whether an incident is covered by this procedure and, if so, whether it is sufficient to warrant formal investigation.

4. Administrative Procedures

- 4.1 An educational community is a place that promotes responsibility, respect, civility and academic excellence in a safe and caring learning and teaching environment. All staff within the Board's learning/working environment will:
- respect differences in people, their ideas and opinions;
 - treat one another with dignity and respect at all times, and especially when there is a disagreement;
 - respect the rights of others;
 - show proper care and regard for Board property and for property of others;

- demonstrate honesty and integrity; and
- respect the need of others to work in an environment supportive of learning and teaching.

4.2 The Board endeavours to maintain an environment free of workplace harassment. The Board expects that all staff in its learning/working environment will:

- become aware of and sensitive to issues of workplace harassment;
- support individuals who are, or have been targets of workplace harassment;
- take steps to prevent workplace harassment;
- take all allegations of workplace harassment seriously and respond promptly;
- provide positive role models; and
- not demonstrate, allow or condone behaviour contrary to the procedure.

4.3 The appropriate Human Resources Manager (or designate) has the responsibility to designate resources for ensuring the implementation of and compliance with this procedure.

4.4 The Human Resources Manager (or designate) will ensure that the Workplace Harassment Prevention and Resolution Procedure is as accessible as possible.

4.5 Reporting Workplace Harassment

Those individuals who are included under Section 2.6 have a right to report workplace harassment. All employees are entitled to have access to the dispute resolution processes. Reports by a non-employee in Section 2.6 may be dealt with under other Board procedures. The Board expects individuals to report in a timely manner in order for the Board to respond effectively.

4.6 Anonymous reports will not be entertained for dispute resolution under this or any other Procedure.

4.7 Other Avenues For Resolving Disputes

This procedure provides a mechanism for dealing with complaints of workplace harassment occurring in the working and learning environment. Nothing in this procedure denies or limits access to other avenues of redress available under the law or through the filing of a grievance or through progressive discipline. In such a case, this process may cease until the parties and their respective representatives have met with the appropriate Human Resources Manager (or designate) to determine which dispute resolution process will proceed and which one(s) will be stayed pending completion of the chosen process.

4.8 Confidentiality

4.8.1 It is the duty of the supervisory and managerial personnel to maintain confidentiality in the complaint process. All complainants, respondents and other persons involved with the complaint processes under this procedure will ensure that all matters remain confidential. Witnesses should be informed that supervisory and managerial personnel, in obtaining statements, will maintain such statements in confidence, subject to their ability to conduct a full and thorough investigation.

4.8.2 Notwithstanding the above, procedural fairness requires that the respondent to a complaint be apprised of the nature of the complaint and by whom it has been made so that they have an opportunity to speak to the allegations. This may require the disclosure of witness names and statements to the parties.

4.8.3 The Board may be required to provide information obtained during an investigation to an outside agency, such as the Ministry of Labour, that has the right to require information otherwise protected by the Municipal Freedom of Information and Protection of Privacy Act.

4.8.4 Records

All correspondence and other documents generated under this procedure must be marked "PRIVATE AND CONFIDENTIAL" in accordance with the Municipal Freedom of Information and Protection of Privacy Act and be stored in a locked and secure file in the Human Resource Services Department. Access to the files is limited to the Human Resources Manager (or designate).

4.8.5 Where an investigation is completed and the determination made that workplace harassment did not occur, the materials collected will be forwarded to the Human Resource Services Department and kept for a period of two years. In all other circumstances, all correspondence relating to the matter will remain with the Human Resource Services Department indefinitely.

4.8.6 Misuse of the Complaint Procedures

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 may occur.

4.8.7 Reprisals

Alleged reprisals shall be investigated as formal complaints and, if substantiated, are subject to the same consequences as complaints of workplace harassment.

4.9 Informal Complaint and Resolution

Refer to Appendix C for flowchart of process

4.9.1. Stage 1

Initially, all employees should make every attempt to resolve matters at the individual level. The first step is to inform the individual that his/her behaviour is unwelcome and must stop immediately. Many disputes can be resolved quickly and effectively using this approach. Supervisory and/or managerial personnel may attempt to provide support to either party, if asked, in order to resolve the incident prior to proceeding with the complaint. If the issue is not resolved, proceed to Stage 2.

4.9.2 Stage 2

Stage 2 is a complaint process involving the Supervisor that provides an opportunity for parties to resolve a dispute mutually in a respectful manner. The Board requires its employees, supervisory and managerial personnel, as well as union/federation representatives, to first consider Stage 1 resolution as a means of resolving issues. Depending upon specific circumstances, the employee's Supervisor has the discretion to begin resolution at Stage 2.

4.9.3 Supervisory and managerial personnel, as well as union/federation representatives, may attempt to facilitate a Stage 2 resolution by:

4.9.3.1 Reviewing Stage 1 process (section 4.9.1) with the complainant and individual and obtaining a commitment that the behaviour will stop;

4.9.3.2 Informing the individual of the complainant's concern regarding the alleged workplace harassment and the Board's expectation for appropriate behaviour;

4.9.3.3 Providing a copy of the Board's Prevention and Resolution of Workplace Harassment Procedure (Administrative Procedure 3740) and/or other relevant Board policies or procedures to the individual alleged to have engaged in the workplace harassment; and

4.9.3.4 Following up with the complainant to ensure that the behaviour has stopped.

4.9.4 In cases where a Stage 2 plan of action is implemented, supervisory and managerial personnel shall follow up by monitoring the situation, holding, if necessary, subsequent meetings with the parties and taking further steps to ensure that the workplace harassment has stopped.

4.9.5 Where disputes are resolved at Stage 2, there will be no formal reports about such disputes. Every effort will be made to protect the privacy of individuals.

- 4.9.6 For Stage 2 complaints, where the parties are members of a union, federation, middle and senior management-groups, or principals' council, a resolution facilitated by the appropriate representative(s) will be acceptable to the Board, if acceptable to the parties.
- 4.9.7 At any time during the Stage 2 resolution process, the complainant and respondent may mutually agree to drop the complaint.
- 4.10 Stage 3 Formal Complaint (Required Stage If Not Resolved Previously)
- 4.10.1 Stage 3
- 4.10.1.1 Stage 3 complaints shall only be considered once all reasonable efforts have been made to resolve the conflict at Stage 1 and Stage 2. The Human Resources Manager (or designate) shall have the discretion to refuse to investigate a Stage 3 complaint where all reasonable efforts have not been made, or, in the opinion of the Human Resources Manager (or designate), have not been made in good faith.
- 4.10.1.2 For support or assistance in completing the Complaint Form to Address Conduct HR-11-400 (Appendix D), employee complainants should contact their appropriate supervisor, a colleague, their union, federation, professional association, or middle and/or senior management representative.
- 4.10.1.3 If the supervisor is the party alleged to be responsible for the workplace harassment or alleged to condone the workplace harassment, the complaint should be reported to the appropriate manager/supervisor immediately above the supervisor.
- 4.10.1.4 Employee respondents may also wish to seek assistance from the appropriate supervisor, a colleague, union, federation, professional association, or middle and/or senior management.
- 4.10.1.5 Supervisory and managerial personnel who are contacted shall follow the procedures set out in Section 4.11 - Procedures for Resolving a Formal Complaint at Stage 3.
- 4.10.2 Respondents To A Complaint
Individuals who are named as respondents in a complaint have a right to a written copy of the Complaint Form to Address Conduct HR-11-400 (Appendix D). In particular, a respondent has a right to know the specifics of an allegation, including times, dates and alleged conduct. Respondents who choose to respond to the allegations must complete and return their response within five (5) working days of receipt of the written copy of the Formal Complaint Form to the Human Resources Manager (or designate).
- 4.10.3 Assessment Criteria
- 4.10.3.1 All formal reports filed under this procedure shall be subject to an assessment within five (5) working days of receipt of the Complaint Form to Address Conduct HR-11-400 by the appropriate Human Resources Manager (or designate) to determine whether the alleged conduct would, if proven, meet the definition of workplace harassment.
- 4.10.3.2 If the Human Resources Manager (or designate), following this threshold assessment, determines that the report filed:
- would not, if true, meet the definition of workplace harassment;
 - does not provide sufficient details of the alleged workplace harassment, provided the complainant is given notice that insufficient details have been provided and is given reasonable time to provide sufficient details;
 - is vexatious, frivolous or trivial, has not been made in good faith or would, if investigated, constitute an abuse of the procedure; or
 - will be dealt with under another procedure;
- the complainant and respondent shall be so advised and no further action shall be taken under this procedure. The complainant or respondent still

may pursue other avenues for resolution (e.g. grievance, complaint to the appropriate College, union judicial procedures).

- 4.10.3.3 Where allegations relate to discrimination and/or harassment on the basis of a ground prohibited by the Ontario Human Rights Code, they shall be addressed using the appropriate Board policy and procedure.
- 4.10.3.4 Where allegations relate to violence in the workplace under the Ontario Health and Safety Act (as amended June 15, 2010) they shall be addressed using the appropriate Board policy and procedure. (e.g. Violence in the Workplace Policy 1009 and Violence in the Workplace Procedure 3780).
- 4.10.3.5 In all cases where the appropriate Human Resources Manager (or designate) has determined that the parties have made all reasonable efforts to resolve the dispute informally or at Stage 1, and has conducted an assessment to determine that a formal complaint should proceed, the Human Resources Manager (or designate) shall direct the appropriate supervisory and managerial personnel to take action to resolve a formal complaint under this procedure.

4.11 Procedures For Resolving A Formal Complaint at Stage 3

- 4.11.1 In all cases, supervisory and managerial personnel will endeavor to take action to resolve any alleged or suspected situations involving workplace harassment prior to a formal complaint being filed.
- 4.11.2 Formal Investigation and Resolution
 - 4.11.2.1 Formal complaints require an investigation of the complaint allegations. The Standard of Proof to be applied is the balance of probabilities. Investigators will be chosen by the Human Resources Manager (or designate).
 - 4.11.2.2 In a formal investigation, the Human Resources Manager (or designate) shall ensure that the following steps are taken as soon as possible:
 - a) take appropriate measures to ensure the safety of the complainant;
 - b) notify the complainant, the respondent and witness(es);
 - c) ensure that the respondent has a copy of the complaint;
 - d) provide an opportunity for the respondent to complete and return their response within five (5) working days of receipt to the Human Resources Manager (or designate);
 - e) interview the complainant and/or the third party reporting the complaint;
 - f) interview the respondent;
 - g) interview witness(es);
 - h) come to conclusions about whether a specific incident did or did not occur based on a balance of probabilities;
 - i) provide a written summary of the findings and conclusions to the complainant and to the respondent and give them an opportunity to respond to same; and
 - j) take appropriate action(s) to resolve the situation.
 - 4.11.2.3 If the respondent declines to participate in the formal investigative process, the investigation shall proceed. The respondent should be encouraged to participate in the interest of a balanced and fair process.
 - 4.11.2.4 The formal investigation shall cease and the matter shall be declared resolved at any time during the investigation, if the complainant and respondent can reach a mutually agreed upon resolution supported by the investigator.
- 4.11.3 Outcomes In Formal Investigations
 - 4.11.3.1 In the event a complaint is not substantiated, no further action will be taken, subject to the section on maintaining records (4.8.4).

If the complaint is found to be trivial, vexatious or an abuse of power, then appropriate actions may be taken up to and including formal discipline.

- 4.11.3.2 If it is determined that there is a need to restore a positive learning or working environment, appropriate steps shall be taken by the Human Resources Manager (or designate) which might include:
- Recommending counselling for the parties (e.g. Resilience Program);
 - Mediation (see 4.11.4);
 - specific training for the complainant and/or respondent, if an employee;
 - workshops for the staff in the school/workplace regarding their rights and responsibilities;
 - permanent separation of respondent and complainant from each other;
 - restorative measures;
 - legal action.
- 4.11.4 Mediated Resolution
- 4.11.4.1 Mediation involves an unbiased third party acting as a facilitator in direct communication between the parties who voluntarily agree to enter into this process. It is an opportunity to resolve disputes in a respectful manner and to generate a variety of options for resolution that contribute to restoring the working relationship between the parties.
- 4.11.4.2 Where there is already a formal complaint being investigated under these procedures, at any time during the investigation, the parties may agree to hold the investigation in abeyance and attempt to achieve a mediated resolution.
- 4.11.4.3 Mediation is appropriate when all parties agree that a mutually agreeable solution is achievable and desirable. The investigator will request approval to mediate or obtain a trained mediator when the parties have expressed an interest in a mediated resolution.
- 4.11.4.4 Meetings required for mediation sessions shall be scheduled as soon as possible and, where practical, in a time and place convenient for the complainant, the respondent and the mediator.
- 4.11.4.5 When matters are resolved through mediation, the complainant and the respondent will sign a plan of action for resolution outlining the terms to which the parties have agreed. No plan will include violations of any Collective Agreement/Terms and Conditions of Employment. Employees are strongly encouraged to seek advice from their union, federation, or professional association in this regard.
- 4.11.4.6 Mediation is voluntary and the complainant or the respondent may choose to withdraw at any time.
- 4.11.5 Disciplinary Actions – Employee Respondents
- 4.11.5.1 The appropriate supervisor or manager may impose discipline as appropriate and consistent with the circumstances.
- 4.11.5.2 The principles of progressive discipline as outlined in Administrative Procedure 3760 - Progressive Discipline will be applied in dealing with disciplinary actions under this procedure. These would include the following possibilities:
- verbal warning (“Notice”);
 - written warning (“Notice”) with copy to Human Resource Services file;
 - written discipline/reprimand;
 - suspension without pay;
 - demotion and/or transfer;
 - dismissal from employment with the Board.
- 4.11.6 Review
- 4.11.6.1 The grounds for review are:
- (a) The investigator(s) fail to comply with these procedures;
 - (b) New evidence becomes known after the final decision but before the expiry of the ten working days limitation period for requesting a review.
- 4.11.6.2 In the event a complainant or respondent to a formal complaint has one or both of the specific concerns listed above, a request may be made to the Superintendent of Human Resources within ten (10) working days of the final decision to convene a review. A reviewer will be appointed by the Superintendent of Human Resource Services.

- 4.11.6.3 No review of the final decision will be undertaken with regard to the claim that the conclusions drawn by the investigator(s) based on findings of fact were incorrect.
- 4.11.6.4 The reviewer will report his/her finding to the Superintendent of Human Resource Services, who will affirm or amend the final decision, or require that a new investigation be undertaken. The complainant and the respondent will each receive a copy of the reviewer's report.
- 4.11.6.5
- 4.11.7 Information And Instruction
The Board shall provide employees with information and instruction that is appropriate for the worker on the contents of the policy and program with respect to workplace harassment and any other prescribed information.

Appendix A

Related Board Policies:

- Occupational Health and Safety – Policy 1002
- Harassment Policy – 1004
- Violence in the Workplace Policy – 1009
- Video Surveillance in Schools Policy – 4010
- Safe Schools – Policy 6000
- Student Discipline – Policy 6008
- Code of Conduct – Policy 6001
- Equity and Inclusion – Policy 1008
- Bullying Prevention and Intervention – Interim Policy 6009

Legal References:

Relevant sections of Education and Employment Statutes and Regulations of Ontario include:

- Occupational Health and Safety Act
- Ontario Human Rights Code
- Education Act: Section 301; Safe Schools Act: Section 283-CEO; Section 264-Duties of a Teacher; Section 265 -Duties of a Principal
- Ontario Schools Code of Conduct
- Municipal Freedom of Information and Protection of Privacy Act
- Criminal Code of Canada
- Ontario College of Teachers Act and Regulations
- Ontario College of Social Work and Social Service Work Act and Regulations
- Ontario College of Speech Language Pathologists and Audiologists Act and Regulations
- Ontario College of Psychologists Act and Regulations
- Teaching Profession Act
- Ontario College of Early Childhood Educators

Related References:

- Violence in the Workplace – Procedure 3780
- Progressive Discipline – Procedure 3760
- Principles of Business Conduct for Board Employees – Procedure 4360
- Student Discipline Procedures – Procedure 1260
- School Police Protocol
- Student Bullying and/or Harassment – Procedure 1200
- Responsibility for Maintaining Safety, Security, and Order in the School Environment – Procedure 1370
- Mandatory Reporting of Serious Violent Incidents to Police – Procedure 1340
- Electronic Communication Devices in Schools – Procedure 1210
- Safety Response Issues in Schools – Procedure 1360
- Use of Video Surveillance Cameras in Schools – Procedure 3100
- Management Process for Student Behaviours Causing a Risk of Injury – Procedure 2330
- Union/Federation Collective Agreements, Employee Terms of Employment and Personal Services Contracts
- Other deemed appropriate documents, as developed from this point forward, may also be pertinent

Appendix B

WORKPLACE HARASSMENT PREVENTION AND RESOLUTION RIGHTS AND RESPONSIBILITIES

Everyone has the right to work and learn in an environment that is free of unwelcome or intimidating behaviour that could create an unsafe and/or unhealthy environment and could interfere with job performance and ability to learn.

Responsibilities of All Employees in Board Learning/Working Environments

It is the responsibility of every employee to create and contribute to a climate of understanding and mutual respect for the rights and dignity of each individual by:

- showing courtesy and self discipline in actions and words;
- seeking informal problem solving of issues;
- respecting rules, regulations and practices that are in place which provide for safe and secure learning and working environments;
- demonstrating honesty, integrity and behaviours that are representative of a positive and supportive atmosphere;
- showing proper care and regard for Board property and for the property of others.

Responsibilities of the Board

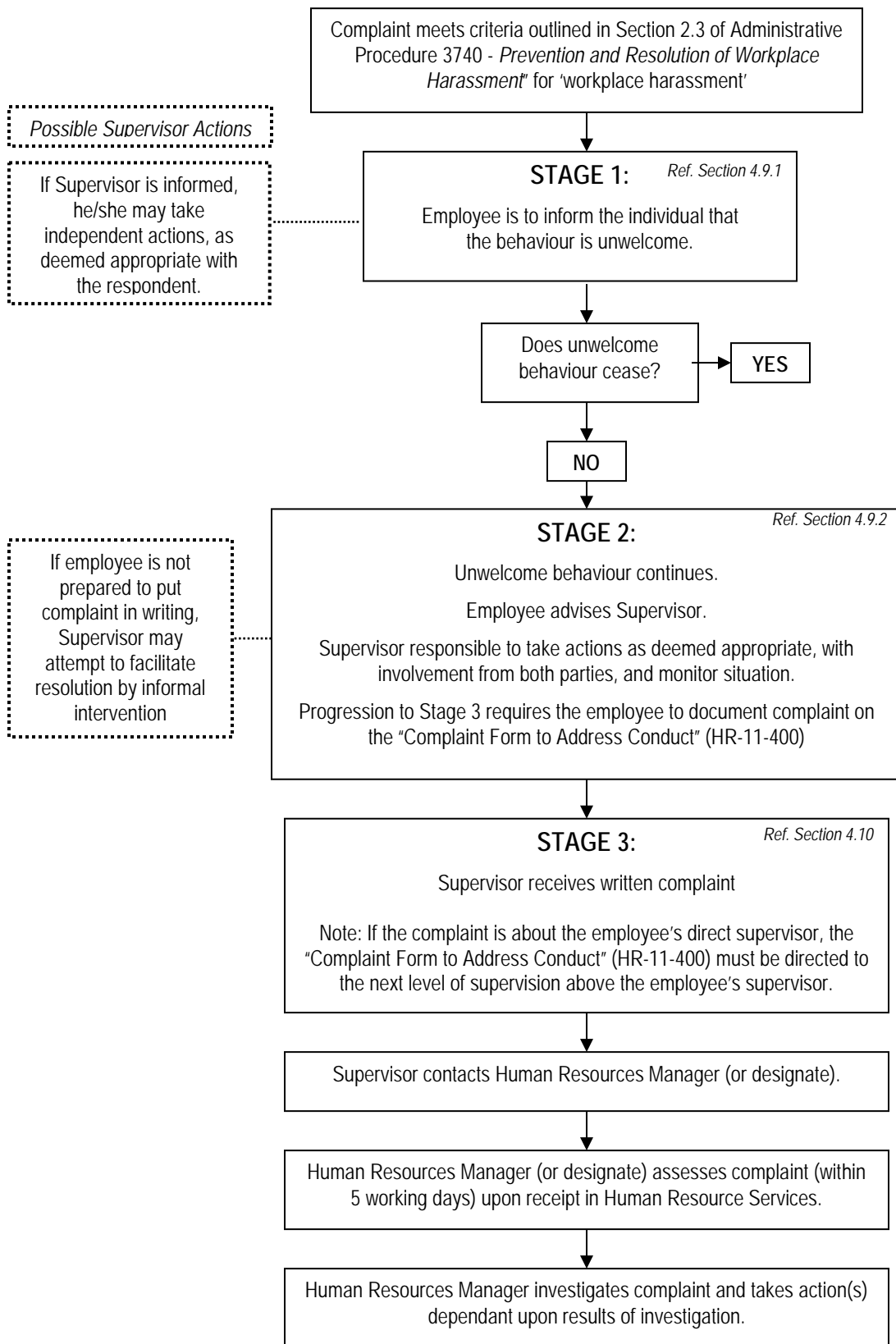
- It is the responsibility of the Waterloo Region District School Board to recognize the dignity and worth of every person and to provide for fairness and equal opportunities without discrimination.
- It is a commitment of the Waterloo Region District School Board to work towards the elimination of workplace harassment in our schools and workplaces.
- It is the duty of the Waterloo Region District School Board to maintain an environment that is safe, caring, nurturing and positive for all persons served by it.

By knowing your rights and responsibilities, you can stop workplace harassment. Employees who feel that they are being subjected to workplace harassment have the right and responsibility to tell the individual concerned that the behaviour is offensive, unwelcome, and must cease. They also have the right to report the workplace harassment to someone in a position of authority who can facilitate resolution of the matter.

If you are experiencing workplace harassment, contact your Principal, Manager/Supervisor or Supervisory Officer, Union/Federation/Association, Middle and Senior Management representatives, or Ontario Principals' Council.

APPENDIX C

WORKPLACE HARASSMENT COMPLAINT AND RESOLUTION PROCESS FLOWCHART



APPENDIX D

Complaint Form to Address Conduct (HR-11-400)



Waterloo Region
District School Board

HR-11-400

COMPLAINT FORM TO ADDRESS CONDUCT
(FOR CODE-BASED AND WORKPLACE HARASSMENT,
BULLYING AND DISCRIMINATION)

PRIVATE AND CONFIDENTIAL

| | | | |
|---|--|---|--|
| Instructions: | <ul style="list-style-type: none"> All persons working for the WRDSB are entitled to access this complaint form. Complainants may seek assistance before completing this form. Place the completed form in a sealed envelope marked "Private and Confidential" Forward as outlined below for a Step 2 or Step 3 investigation A copy should be retained by the complainant. | | |
| The complaint is being submitted at: | <input type="checkbox"/> Step 2 – to be submitted to the complainant's supervisor** <input type="checkbox"/> Step 3 – to be submitted to the Human Resources Manager** <small>(** If the complaint is against an employee, a copy should be sent to the complainant's association and to the respondent if required by law or association by-law)</small> | | |
| Name of Complainant: | | | Job Title: |
| Daytime Phone Number: | | | Workplace: |
| Name(s) and status of individual(s) who is (are) the subject of the complaint: | 1 | Name: | |
| | | WRDSB Employee: <input type="checkbox"/> Yes <input type="checkbox"/> No | NOT WRDSB employee, status: (e.g. visitor, contractor, etc) |
| | 2 | Name: | |
| | | WRDSB Employee: <input type="checkbox"/> Yes <input type="checkbox"/> No | NOT WRDSB employee, status: (e.g. visitor, contractor, etc) |
| Date(s) of Incident(s): | Time(s): | Location: | |
| Description of alleged objectionable behaviour (harassment, bullying, discrimination): <i>Attach further information if required</i> | | | |
| Description of steps taken by complainant to-date to address conduct: | | | |
| Resolution Requested: | | | |

Complainant Signature

Date

Supervisor Signature (Indicating receipt)

Date of Receipt

The information contained in this form is confidential and every reasonable step will be taken to maintain confidentiality in accordance with the provisions of the Municipal Freedom of Information and Protection of Privacy Act. This form, and any attachments, will be copied to the respondent(s) named above, in accordance with the formal complaint process.

February 2011