

Complaint to the British Columbia Human Rights Tribunal

Filed under section 7 of the Human Rights Code, RSBC 1996, c 210

STEP 1 -- RESPONDENTS

Respondent 1: Lena Wu, Spa Manager, Xylia Spa Ltd. Respondent 2: Tony Medd, General Manager, Paradox Hotel Vancouver.

STEP 2 -- AREA OF DISCRIMINATION AND GROUNDS

Part A -- Area

Employment (section 13 of the Human Rights Code).

Part B -- Grounds of Discrimination

Sex -- The Complainant is female. She was sexually assaulted in the course of her employment after being assigned, without safety measures, to a male client who specifically requested a female therapist. The Respondents' subsequent conduct minimized the gender-based nature of the assault and failed to address the resulting harm. Mental disability -- The Complainant developed clinically recognized Post-Traumatic Stress Disorder (PTSD), anxiety, and depression as a direct consequence of the workplace sexual assault and the Respondents' failure to provide support, accommodation, or a safe return-to-work process. The Respondents used these mental health conditions against the Complainant, labelling her an "emotional wildfire" and ultimately terminating her employment. Age -- The Complainant was 18 years old at the time of the assault. Her youth and inexperience were exploited by the Respondents, who isolated her from support, pressured her to return to work without adequate accommodations, and left her to navigate post-assault processes entirely on her own. Gender identity or expression -- The Complainant's identity as a young woman was a factor in how the Respondents minimized the assault. Comments about her appearance had been made in the workplace prior to the assault. The assault itself constituted gender-based violence against a young woman in a vulnerable position. Family status -- The Respondents were aware that the Complainant was an 18-year-old living alone in Vancouver with no family support in the city. Despite this awareness, and despite Respondent 1 having emailed the Complainant's mother on October 16, 2022 promising to "take care of" her, the Respondents provided no meaningful support after the assault and exploited the Complainant's isolation. Lawful source of income -- The Complainant was financially dependent on her employment income from Xylia Spa. The Respondents' failure to provide a safe workplace, accommodate her return, or maintain her employment left her destitute -- by December 20, 2022, her bank balance was hovering at \$0 and at times in overdraft, and she was accessing food banks and homelessness prevention programs.

STEP 3 -- PARTICULARS OF THE COMPLAINT

Part 1 -- What Happened

The Complainant was an 18-year-old medical esthetician and spa therapist who began employment at Xylia Spa Ltd., located inside the Paradox Hotel Vancouver, in October 2022. On October 17, 2022, she was sexually assaulted by a client during a massage treatment. The client was an older male who had specifically requested a female therapist. The Respondents had no safety protocols, no panic systems, no policy for vetting client requests, and no training on risk prevention. Following the assault, the Respondents failed to provide trauma-informed care, pressured the Complainant to return to work almost immediately, breached her privacy, aided the assailant in evading police contact, used dismissive and minimizing language, and ultimately terminated her employment in apparent retaliation after a family member raised concerns about the Respondents' failures. These

actions and omissions constituted discrimination on the grounds of sex, mental disability, age, gender identity or expression, family status, and lawful source of income in the area of employment.

Part 2 -- Chronological Account of Discriminatory Conduct

The following consolidated timeline sets out, in chronological order, the conduct that forms the basis of this complaint.

Date(s): September 28, 2022

The Complainant attended a job interview with Respondent 1, Lena Wu, at Xylia Spa. She was 18 years old and had recently graduated. Respondent 1 was aware of the Complainant's age, that she was living alone in Vancouver without family support, and that this was her first professional position.

Grounds engaged: Age; family status

Date(s): October 4, 2022

The Complainant's first official day of employment at Xylia Spa. During the onboarding and training period, there was no discussion of safety protocols, risk prevention, panic systems, or procedures for handling incidents. Training covered only massage techniques.

Grounds engaged: Sex (failure to protect female worker); age (failure to protect young worker)

Date(s): October 16, 2022

Respondent 1 sent an email to the Complainant's mother stating that the Xylia team loved having the Complainant as part of the "Xylia family" and that Respondent 1 would "be sure to take care of" her. This email demonstrates that Respondent 1 was fully aware of the Complainant's family status and assumed a duty of care. [Documentary evidence: email from Lena Wu to Complainant's mother, dated October 16, 2022.]

Grounds engaged: Family status

Date(s): Approximately October 10-16, 2022

At the front desk of the spa, Respondent 2, Tony Medd, made a comment about another male therapist who was frequently requested by clients, stating: "What is he doing, happy endings? That's why his tips are so good." He then laughed. The Complainant and Respondent 1 were present. This comment created a workplace culture in which sexualized references to massage services were normalized and trivialized. Days later, the Complainant was sexually assaulted.

Grounds engaged: Sex; gender identity or expression

Date(s): October 17, 2022 -- The Assault

The Complainant was asked to come in and perform a 90-minute massage for a client. This was her first 90-minute session, which requires the client to turn over (unlike a 60-minute session which covers only the back). The client was an older male who had specifically requested a female therapist. No risk assessment, safety briefing, or vetting was conducted by the Respondents before this assignment. During the massage, the Complainant was sexually assaulted by the client. She did not know how to safely exit the room or summon help, as no panic button or emergency procedure existed. The absence of any safety protocol left her trapped and alone during the assault. This conduct constitutes a failure by both Respondents to provide a safe workplace, specifically failing to protect a young female worker from foreseeable gender-based harm.

Grounds engaged: Sex; age; gender identity or expression

Date(s): October 17, 2022 -- Immediate Aftermath

After the Complainant disclosed the assault, police were called. However, prior to contacting police,

Respondent 1 placed a phone call to the assailant's hotel (the Rosewood Hotel Georgia), alerting staff that police would be coming. This phone call enabled the assailant to leave the country before police could make contact, eliminating any prospect of criminal accountability. Respondent 1 initially withheld this information from the Complainant, who learned of it later. Additionally, the Complainant observed that the spa receptionist was emailing a friend about the assault, constituting a further breach of privacy. While the Complainant gave her statement to police, Respondent 1 hovered nearby. The Complainant felt pressured, as though the assault was her fault and a burden on Respondent 1's business. The police interview took place in a room with the same layout as the room where the assault occurred. [Documentary evidence: police report; receptionist's emails (referenced); phone records showing call to hotel prior to police call.]

Grounds engaged: Sex (minimizing gender-based assault); mental disability (exacerbating trauma)

Date(s): October 17-18, 2022 -- Forced Isolation with Employer

Respondent 2 (Tony Medd) instructed the Complainant to stay overnight with Respondent 1 at the Paradox Hotel. The Complainant was given no privacy or separation from her employer during the first 24 hours following the sexual assault. She was isolated from any external support. During this time, Respondent 1 attempted to minimize the Complainant's experience, telling her she was "going to be okay" and that she "just had to keep moving forward and get back to work." Respondent 1 was defensive when police asked whether the spa had a safety policy, stating: "How could they ask me that, like I wanted this. This spa is my baby." This response prioritized the business over the Complainant's wellbeing and invalidated the severity of the gender-based assault. The following morning, on October 18, 2022, the Complainant was asked whether she could take her clients the next day. Respondent 1 agreed to take the clients for that day only, but instructed the Complainant to come in on October 20 for "mandatory training," as the training had been paid for. After this conversation, the Complainant was left to find her own way home with no resources, referrals, or support -- only the expectation that she return to work.

Grounds engaged: Sex; mental disability; age; family status

Date(s): October 20-21, 2022 -- Pressure to Return to Work

On October 20, the Complainant attempted to attend the mandatory training. She experienced severe anxiety and distress upon entering the spa, particularly as the training involved the same room setup where the assault occurred. She was unable to complete the training and left early, suffering a breakdown. That evening, the Complainant received a text message from the training instructor stating: "Hi Aidan, I hope you are OK. Whatever is going on, I hope you can let it go and come in tomorrow to learn. It is very important that you get this training. It is mandatory part of your job so please heal it. Let it go and come in fresh face for tomorrow." This message demonstrates a complete absence of trauma-informed care and continued pressure to return to work without acknowledgment of the assault. On October 21, the Complainant attempted again but could not complete the training. [Documentary evidence: text messages from training instructor, dated October 20, 2022.]

Grounds engaged: Mental disability (failure to accommodate PTSD); sex (minimizing sexual assault)

Date(s): Approximately October 22-26, 2022

The Complainant made further attempts to return to the workplace. She experienced significant difficulty entering the building, sometimes waiting hours before being able to go inside. When she did enter, Respondent 1 did not take time to assess how the Complainant could safely complete training or feel secure in the space. Instead, the Complainant was repeatedly asked whether she could take clients and resume work. No trauma-informed care, mental health accommodations, or safety improvements were offered at any point. The Respondents provided no resources, referrals, or acknowledgment of the sexual assault's impact.

Grounds engaged: Mental disability; sex; age

Date(s): Late October to November 2022

Unable to continue working in the unsafe environment, the Complainant took time away from the spa. During this period, she self-sourced resources entirely on her own, with no assistance from the Respondents. She connected with the Sexual Assault Support Centre (SASC) at UBC, which introduced her to the possibility of a WorkSafeBC claim, given that the assault occurred at work. In early November 2022, the Complainant informed Respondent 1 over the phone that she had reached out to WorkSafeBC, as advised by the UBC Sexual Assault Support Centre. On November 4, 2022, following this phone conversation, Respondent 1 emailed the Complainant to offer supports that the Complainant had already mentioned she was considering pursuing -- suggesting that Respondent 1 may have received internal legal advice to offer at least some form of support. Following this, the tone and frequency of communication from Respondent 1 changed markedly. Respondent 1 had previously maintained a personal relationship with the Complainant, referring to her as her "little sister." Communication now became guarded and eventually ceased. Throughout this period, Respondent 1 continued to ask the Complainant whether she could take clients, but offered no tangible help, safety improvements, or efforts to create a safe return-to-work process.

Grounds engaged: Mental disability (failure to accommodate); sex; lawful source of income

Date(s): November-December 2022 -- Financial Crisis

The Complainant, an 18-year-old living alone in Vancouver with no family support in the city, was left without any income from the Respondents following the assault. She received no pay, no accommodation support, and no financial assistance. By December 20, 2022, the Complainant's bank balance was hovering at \$0 and at times in overdraft. She was accessing food banks, mental health support groups, and a homelessness prevention program to survive. She was on the verge of homelessness as a direct result of the Respondents' failure to maintain a safe workplace, support her after the assault, or accommodate her mental health conditions. The Complainant's financial devastation was a foreseeable consequence of the Respondents' conduct, given their knowledge of her complete financial dependence on her employment income and her lack of family support.

Grounds engaged: Lawful source of income; age; family status; mental disability

Date(s): December 2022 to January 2023 -- Attempts to Communicate

The Complainant reached out to Respondent 1 regarding a Christmas dinner, as she had no access to food or family. During the dinner, she was instructed not to discuss WorkSafeBC or the assault. Around the new year, the Complainant initiated contact with Respondent 1, seeking to discuss her situation. The tone of Respondent 1's communication had transformed entirely. The Complainant was repeatedly told:

- "Do not call it a sexual assault in my spa."
- "What's your game plan?"
- "We need to protect ourselves."
- That Respondent 2 (Tony Medd) would need to be present for any conversations.

The Complainant felt discriminated against, intimidated, and excluded because she was a young female worker experiencing mental health conditions after a workplace sexual assault. The shift in language from familial warmth to adversarial distancing was marked and harmful.

Grounds engaged: Sex; mental disability; age

Date(s): After January 2023 -- Complete Cessation of Contact

After January 2023, Respondent 1 ceased all communication with the Complainant. There was no contact from the employer for approximately eight months. During this period, the Complainant

commenced a WorkSafeBC process in an attempt to gradually return to work and regain her income. Throughout the WorkSafeBC process, the Complainant attended all required appointments and made consistent efforts toward recovery. Despite this, the Respondents made no effort to improve workplace safety, add protocols or security measures, provide accommodations, or communicate with the Complainant about her return to work. The Respondents' ongoing failure to create a safe work environment prevented the Complainant from returning. Her PTSD, anxiety, and depression intensified as a result of the lack of accountability, support, and follow-up. This ongoing failure constituted a continuing contravention under section 7 of the Human Rights Code.

Grounds engaged: Mental disability (failure to accommodate); sex; lawful source of income

Date(s): August 2023 -- Confrontation at Workplace

After approximately eight months of no contact, the Complainant attended the workplace and asked to speak with Respondent 1. Both Respondent 1 and Respondent 2 came to speak with her. Respondent 2 (Tony Medd) stated that "they don't even know what all supposedly happened," despite having been present during the immediate aftermath of the assault. Respondent 2 called the Complainant an "emotional wildfire." Respondent 2 made dismissive comparisons, likening the Complainant's experience to a "paper cut" and a "simple ankle injury," trivializing a violent sexual assault. Respondent 2 told the Complainant to leave the building. The Complainant was told not to call the incident "a sexual assault in the workplace," was told to "let it go," and was told it was "her responsibility to get better before coming to them." This language was deeply harmful. It blamed the Complainant for her mental health conditions, denied the reality of the sexual assault, and created an environment in which the Complainant could not safely process trauma. It directly impaired her exposure therapy and recovery process, as she was denied access to the environment where the assault occurred -- access that is a recognized component of PTSD treatment. This further stalled her ability to return to work and earn income.

Grounds engaged: Mental disability; sex; age; lawful source of income

Date(s): August 2023 to Early 2025 -- Continued Exclusion

After the August 2023 confrontation, there was no further meaningful contact between the Complainant and the Respondents. WorkSafeBC determined that the Complainant was unable to return to work due to safety concerns and the unresolved impact on her mental health. Throughout this entire period, the Respondents never had a single conversation with the Complainant in which the harm she suffered was acknowledged or addressed. No safety improvements were made. No accommodations were offered. The Complainant's PTSD, anxiety, and depression remained unresolved. The Complainant believes that Xylia Spa and the Paradox Hotel continue to operate without adequate safety protocols, posing ongoing risk to young female workers or otherwise.

Grounds engaged: Mental disability; sex; lawful source of income

Date(s): Approximately March 2025 -- Retaliatory Termination

A family member of the Complainant called the spa to express concern about the Respondents' handling of the assault and their ongoing failures. Following this call, the Respondents terminated the Complainant's employment, claiming they felt "threatened." The sequence of events strongly indicates that the termination was retaliatory:

1. The Complainant's family member raised concerns about the Respondents' conduct.
2. Shortly after this call, the Respondents terminated the Complainant's position.
3. The stated reason -- that the Respondents felt "threatened" -- does not constitute a legitimate, non-discriminatory reason for termination. It reflects instead the Respondents' pattern of characterizing the Complainant's trauma responses and advocacy as threatening (consistent with the "emotional

wildfire" label). This termination constitutes retaliation contrary to section 43 of the Human Rights Code. It also constitutes discrimination in employment on the basis of the Complainant's mental disability, sex, and age. The termination extinguished the Complainant's remaining hope of returning to her position and further destabilized her financial situation and mental health.

Grounds engaged: Mental disability; sex; age; lawful source of income; retaliation (s. 43)

RESPONDENT-SPECIFIC CONDUCT

Respondent 1 -- Lena Wu, Xylia Spa Ltd.

Respondent 1 was the Complainant's direct employer and the manager of Xylia Spa. The following conduct is attributed specifically to Respondent 1:

1. Operated a spa with no safety policies, protocols, panic systems, or procedures for vetting client requests for female workers. This failure to establish basic workplace safety measures directly exposed the Complainant to the sexual assault. (Grounds: sex, age)
 2. Prior to calling police after the assault, placed a phone call to the assailant's hotel that enabled the assailant to leave the country before police contact. Withheld this information from the Complainant. (Grounds: sex, mental disability)
 3. Breached the Complainant's privacy by sharing details of the assault without consent. The spa receptionist was observed emailing a friend about the assault. (Grounds: sex, mental disability)
 4. Isolated the Complainant in a hotel room on the night of the assault and minimized her experience, stating she should "keep moving forward and get back to work." Prioritized the business reputation over the Complainant's wellbeing. (Grounds: sex, mental disability, age)
 5. Asked the Complainant to take clients the morning after the assault. Required her to attend "mandatory training" two days after the assault, without any trauma-informed accommodation. (Grounds: mental disability, sex)
 6. Failed to offer any resources, referrals, support, or accommodations at any point following the assault. The Complainant was forced to self-source all support, including connecting with SASC at UBC. (Grounds: mental disability, age, family status)
 7. Changed communication tone from personal ("little sister," "Xylia family") to adversarial after the Complainant mentioned WorkSafeBC. Told the Complainant not to call the incident "a sexual assault in my spa." (Grounds: sex, mental disability)
 8. Ceased all communication with the Complainant after January 2023. Made no efforts over more than two years to improve workplace safety, offer accommodations, or facilitate a return to work. (Grounds: mental disability, lawful source of income)
 9. Terminated the Complainant's employment after a family member raised concerns, claiming to feel "threatened."
- (Grounds: mental disability, sex, age, retaliation)

Respondent 2 -- Tony Medd, Paradox Hotel Vancouver

Respondent 2 was the General Manager of the Paradox Hotel Vancouver, within which Xylia Spa operated. The following conduct is attributed specifically to Respondent 2:

1. Made a sexualized comment in the workplace about another therapist's tips ("What is he doing, happy endings?

That's why his tips are so good"), normalizing sexualized references to massage services in the presence of the Complainant, a young female worker. This occurred approximately one week before the assault. (Approximately October 10-16, 2022) (Grounds: sex, gender identity or expression)

2. Instructed the Complainant to stay overnight with Respondent 1 at the Paradox Hotel on the night of the assault,

isolating her from external support during the critical first 24 hours after the sexual assault. (October 17, 2022) (Grounds: sex, mental disability, age)

3. Collaborated with Respondent 1 in operating the spa without adequate safety protocols, security measures, or risk

prevention procedures, despite the spa being located within the Paradox Hotel where Respondent 2 served as General Manager. (Ongoing) (Grounds: sex, age)

4. During the August 2023 meeting, stated that "they don't even know what all supposedly happened," despite having

been present in the immediate aftermath of the assault. This denial of knowledge was dismissive and indicated a deliberate avoidance of accountability. (August 2023) (Grounds: sex, mental disability)

5. Called the Complainant an "emotional wildfire," directly using her mental health conditions against her in a demeaning

and stigmatizing manner. (August 2023) (Grounds: mental disability)

6. Made dismissive comparisons between the Complainant's experience and minor injuries such as a "paper cut" and a

"simple ankle injury," trivializing a violent sexual assault. (August 2023) (Grounds: sex, mental disability)

7. Told the Complainant to leave the hotel building, physically excluding her from the workplace environment and

impeding her recovery process, which required gradual re-exposure to the workplace as part of PTSD treatment. (August 2023) (Grounds: mental disability, lawful source of income)

8. Required that he be present for any conversations between the Complainant and Respondent 1, creating an

adversarial and intimidating dynamic that hindered the Complainant's attempts to address the harm and negotiate a safe return to work. (January 2023 onward) (Grounds: sex, mental disability, age)

CONNECTION BETWEEN CONDUCT AND LEGAL GROUNDS

Each incident of discriminatory conduct engages one or more of the protected grounds identified in Step 2. The following summarizes the connections: Sex (s. 13, Human Rights Code): The Complainant was assigned to a male client who requested a female therapist, with no safety measures. The assault was gender-based. The Respondents minimized the assault, told the Complainant not to call it a "sexual assault," and failed to acknowledge the gender-based nature of the harm. Mental disability (s. 13): The Complainant developed PTSD, anxiety, and depression as a direct result of the assault and the Respondents' conduct. The Respondents failed to accommodate these conditions, used them against the Complainant ("emotional wildfire"), and ultimately terminated her employment based on characterizations of her trauma responses as threatening. Age (s. 13): The Complainant was 18. Her youth was exploited through isolation, lack of support, pressure to

return to work, and failure to provide resources appropriate for a young vulnerable worker. Gender identity or expression (s. 13): The Complainant's identity as a young woman was a factor in the assignment to the male client, the sexualized workplace comments, and the minimization of the gender-based assault. Family status (s. 13): The Respondents knew the Complainant was alone in Vancouver without family support and exploited this vulnerability by providing no support, isolating her, and leaving her to navigate alone. Lawful source of income (s. 13): The Complainant was dependent on her employment income. The Respondents' conduct left her destitute (with a bank balance hovering at \$0 and at times in overdraft as of December 20, 2022), reliant on food banks and homelessness prevention programs, and ultimately terminated her employment.

HARM AND IMPACT

The Respondents' discriminatory conduct has caused the Complainant severe and ongoing harm, including:

Mental and emotional harm:

- Clinically diagnosed PTSD, anxiety, and depression arising from the assault and the Respondents' subsequent conduct.
- Impaired ability to undergo effective treatment, including exposure therapy, due to being denied access to the workplace.
- Ongoing psychological distress from the Respondents' refusal to acknowledge the harm.

Financial harm:

- Complete loss of employment income from October 2022 onward.
- By December 20, 2022, the Complainant's bank balance was hovering at \$0 and at times in overdraft.
- The Complainant was forced to rely on food banks and a homelessness prevention program.
- She was on the verge of homelessness at 18 years old.
- The financial impact has been ongoing, as her mental health conditions have impaired her ability to seek alternative employment.
- Final termination in approximately March 2025 extinguished any remaining prospect of returning to her position.

Impact on dignity and self-worth:

- Being told not to call the incident a "sexual assault" denied the Complainant's lived experience.
- Being called an "emotional wildfire" stigmatized her mental health conditions.
- The Respondents' comparisons of her trauma to a "paper cut" or "ankle injury" trivialized the violence she endured.
- The retaliatory termination communicated that advocating for oneself after a workplace sexual assault results in punishment.

SUPPORTING EVIDENCE AND DOCUMENTATION

The Complainant is prepared to provide the following evidence in support of this complaint:

1. Email from Respondent 1 (Lena Wu) to the Complainant's mother, dated October 16, 2022, demonstrating

- Respondent 1's awareness of the Complainant's family status and assumption of a duty of care.
2. Text messages from the training instructor, dated October 20, 2022, pressuring the Complainant to return to work and "let it go" and "heal it."
 3. Text messages between the Complainant and Respondent 1 showing the shift from personal, supportive language to adversarial, minimizing language following the mention of WorkSafeBC.
 4. Emails sent by the spa receptionist to a friend discussing the Complainant's assault (breach of privacy).
 5. WorkSafeBC records documenting the Complainant's claim, treatment, and determination that she was unable to return to work.
 6. Police report from October 17, 2022.
 7. Records from the Sexual Assault Support Centre (SASC) at UBC.
 8. Records from mental health support services, food bank access, and homelessness prevention program participation.
 9. Any available records of the Complainant's employment, pay, and termination from Xylia Spa Ltd.

STEP 4 -- TIME LIMIT

The Complainant acknowledges that some of the conduct described in this complaint may have occurred more than one year before the filing date. However, the Complainant respectfully submits that the Tribunal should accept this complaint for the following reasons:

A. Continuing Contravention

The Respondents' discriminatory conduct was not a single discrete event but rather a continuing course of conduct that persisted from October 17, 2022 (the date of the assault) through approximately March 2025 (the date of the retaliatory termination). The pattern includes:

- Failure to provide a safe workplace (ongoing from October 2022)
- Failure to accommodate the Complainant's mental health conditions (ongoing from October 2022 to termination)
- Failure to improve workplace safety or communicate with the Complainant (ongoing from January 2023)
- Active exclusion from the workplace (August 2023 onward)
- Retaliatory termination (approximately March 2025)

In BC Human Rights Tribunal jurisprudence, where discriminatory conduct is part of a continuing contravention, the Tribunal may consider the entire course of conduct even where some acts fall outside the one-year limitation period: see, e.g., School District No. 44 (North Vancouver) v. Jubran, 2005 BCCA 201; SEPT v. Professional Employees Association (No. 2), 2020 BCHRT 19. Each incident described above is connected to the same discriminatory pattern of conduct by the same Respondents, arising from the same underlying facts.

B. Delay Was Not Unreasonable

The Complainant was 18 years old, living alone in Vancouver without family support, suffering from PTSD, anxiety, and depression, and attempting to navigate the WorkSafeBC system. She was in a state of financial crisis and focused on survival. Any delay in filing was a direct consequence of the harm caused by the Respondents' discrimination and should not bar the complaint.

C. No Prejudice to the Respondents

The Respondents have been aware of the Complainant's allegations since the date of the assault. The WorkSafeBC process has documented the events. Key evidence, including emails, text messages, and employment records, is available. Accepting the complaint will not cause significant prejudice to the Respondents.

D. Public Interest

This complaint raises serious issues of workplace safety, employer accountability for gender-based violence, and the treatment of young vulnerable workers. Accepting the complaint is in the public interest and serves the purposes of the Human Rights Code, including fostering a climate of understanding and mutual respect where all are equal in dignity and rights (Preamble, Human Rights Code).

REMEDY SOUGHT

The Complainant respectfully requests that the Tribunal order the following remedies pursuant to section 37 of the

Human Rights Code:

1. A declaration that the Respondents' conduct contravened the Human Rights Code.
2. An order that the Respondents cease the contravention and refrain from committing the same or a similar contravention.
3. Compensation for lost wages and income from the date the Complainant's employment income was effectively terminated (October 2022) to the present and ongoing.
4. Compensation for injury to dignity, feelings, and self-respect.
5. An order that the Respondents implement adequate workplace safety policies, including protocols for client assignments, risk assessment, panic systems, incident response, and trauma-informed care.
6. Reimbursement for expenses incurred as a result of the discrimination, including mental health treatment costs.
7. Such further and other relief as the Tribunal considers just and appropriate.