



Workplace Violence Prevention

#300.20

Adopted:	June 22, 2010
Last Reviewed/Revised:	June 24 2025
Responsibility:	Superintendent of Education
Next Scheduled Review:	May 1, 2029

POLICY STATEMENT:

The Brant Haldimand Norfolk Catholic District School Board (the Board) is committed to fostering a Christ-centered, safe, respectful, and healthy working and learning environment for all staff, students, volunteers, visitors, and community members. This policy is enacted in accordance with the principles of Catholic Social Teaching, and compliance with the Ontario Human Rights Code, Occupational Health and Safety Act, R.S.O. 1990, c. O.1 (OHSA), the Education Act, R.S.O. 1990, c. E.2, and associated regulations.

The Board recognizes that the inherent right of all individuals to be treated with dignity and respect is central to Catholic values and beliefs and supports a safe and nurturing environment for all staff and students. As a Catholic Learning Community, we believe in the prevention of workplace violence and promoting a workplace in which all people including employees, supervisors, and members of the public respect one another and work together to achieve common goals. The Board is committed to protecting employees from workplace violence from all sources. Violent behaviour in the workplace is unacceptable conduct and erodes the mutual trust and confidence that is essential to the well-being of our staff.

APPLICATION AND SCOPE:

The Board has a legal, ethical and moral responsibility to investigate threats and acts of violence against any employee. The purpose of this policy is to define and communicate expectations, roles, and responsibilities in preventing, reporting, and addressing workplace violence within our school board community. This policy applies to all employees, trustees, students, parents/guardians, volunteers, contractors, and members of the public who interact with the Board at Board workplaces, during Board-sponsored activities, and offsite Board business.

It is Policy of the Board that:

- Every reasonable precaution in the circumstances is taken to protect employees from all sources of workplace violence; this includes protecting employees from the hazard of workplace violence [section 25(2)(h) OHSA].
- Information and instruction on the contents of this policy and the accompanying administrative procedure are provided to the employee to protect the health and safety of the employee [section 25(2)(a) OHSA];
- Equipment, materials and protective devices provided by the Board are maintained and in good condition [section 25(1)(b) OHSA]
- The Board's responsibilities relating to workplace violence are identified in terms of awareness, prevention and response;
- Assessment(s) reviewing the risks of violence in the workplace are conducted annually on or before November 30, and as often as necessary thereafter in accordance with the provisions of the OHSA to ensure protection of employees from workplace violence;
- Assistance and cooperation are provided to the Joint Health and Safety Committee(JHSC); and
- The person reporting a violent incident or any person who is negatively impacted by a violent act in the workplace is supported and will not be criticized or reprimanded for having made the report.

REFERENCES:

- Occupational Health and Safety Act and Regulations
- Ontario Human Rights Code
- Education Act
- Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)



- 200.09 Catholic Code of Conduct: Positive Student Behaviour, Progressive Discipline and Safety
- 200.13 Notification of Risk of Injury and Student Safety Plan Policy and Administrative Procedure
- 300.01 Workplace Harassment Policy and Administrative Procedure
- 300.16 Health and Safety Policy and Administrative Procedure
- 300.21 Work Refusal Administrative Procedure
- 400.04 Emergency Response Plan Policy
- 400.06 Security of Schools, Buildings and Grounds Policy
- 400.11 Video Security Surveillance Policy
- 400.15 Protection of Property Policy

FORMS:

- Violent Incident Report – Form 1 (located in the BHNCDSB Online Reporting Tool)

APPENDICES:

- N/A.

DEFINITIONS:

Bullying: aggressive and typically repeated behaviour (includes the use of any physical, verbal, electronic, written, or other means) where:

- a) The behaviour is intended to have the effect of or ought to reasonably be known that the behaviour would be likely to have the effect of:
 - i. Causing harm, fear or distress to another individual, including physical, psychological or social harm, harm to the individual's reputation or harm to the individual's property, or
 - ii. Creating a negative environment for another individual, and
- b) The behaviour occurs in the context where there is a real or perceived power imbalance based on factors such as size, strength, age, intelligence, economic status, social status, religion, ethnic origin, sexual orientation, family circumstances, gender, gender identity, gender expression, race or disability

Complainant: a person who considers that he/she has been subjected to workplace violence related reprisal even though that individual may not lay a formal written complaint. Similarly, a person named as harasser in a complaint will be referred to as the Respondent.

Critical Injury: as defined in the OHSA, means an injury of serious nature that,

- a) Places life in jeopardy
- b) Produces unconsciousness
- c) Results in substantial loss of blood
- d) Involves the fracture of a leg or arm but not a finger or toe,
- e) Involves the amputation of a leg, arm, hand or foot but not a finger or toe,
- f) Consists of burns to a major portion of the body, or
- g) Causes the loss of sight in an eye.

Domestic Violence: a pattern of coercive behaviour that is used by one person in an intimate relationship to gain power and control over. Domestic violence includes physical, sexual, emotional, psychological and financial abuse. Involves a person who has a relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member – who may harm, or attempt or threaten to physically harm that worker at work. In these situations, domestic violence is considered workplace violence.

Resource Person: Principals, Managers, Supervisors, Supervisory Officer responsible for Human Resources or the Director of Education.

Sexual Violence: any sexual act, or act targeting a person's sexuality, gender identity, or gender expression, whether the act is physical or psychological in nature; that is committed, threatened, or attempted against a person without the



person's consent, and includes sexual assault, sexual harassment, stalking, indecent exposure, voyeurism, and sexual exploitation.

Workplace: any place where employees perform work or work-related duties or functions. Schools and school-related activities such as extracurricular activities and excursions comprise the workplace, as do the Board office and facilities. In addition, conferences and training sessions fall within the scope of the workplace.

Worker: Any person defined as a worker under the OHSA, including staff, volunteers, and interns

Workplace Violence: as defined in the OHSA, means:

- a) The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- b) An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; and
- c) A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

ADMINISTRATIVE PROCEDURES:

This Administrative Procedure was developed to support and implement Policy 300.20; to clarify roles and responsibilities, and to assist employees and their supervisors in preventing, responding to, reporting and managing workplace violence.

This policy applies to all Board employees, trustees and other users of the Board's facilities, such as members of consultative committees, parents, volunteers, contractors and employees of other organizations not related to the Board, but who work on or are invited onto Board premises. This policy also covers workplace violence by such persons which are proven to have repercussions that adversely affect the Board's learning and working environment.

This policy addresses workplace violence under the OHSA and applies to all employees. The policy addresses workplace violence from all sources which may include: employees, supervisors, trustees, students, parents, suppliers and members of the public.

The rights of students to a respectful working and learning environment, free from violence, are dealt with separately under applicable policies, legislation or regulations including, but not limited to, the Education Act, Ontario Schools Code of Conduct and codes of behaviour.

1.0 RESPONSIBILITIES

1.1 Shared Responsibility: Every Person involved with or working for the Board must:

- Treat co-workers, students and the public with respect and dignity;
- Reduce incidents of workplace violence, domestic violence and workplace sexual violence by practicing principles of prevention;
- Understand and comply with the Workplace Violence Prevention Policy, 300.20 and all related procedures; and
- Maintain confidentiality.

1.2 Trustee Responsibilities:

- Approve and support the implementation of this policy.

1.3 Director of Education and Senior Administration Responsibilities:

- Ensure compliance with the OHSA and the Education Act.
- Allocate necessary resources for training and program implementation.

1.4 Management Responsibilities:

- Implement preventative measures and promote safe work environments.
- Ensure an employee works in a manner and with the protective devices, measures and procedures required by OHSA and its regulations [section 27(1)(a) OHSA];



- Ensure an employee uses or wears the equipment, protective devices or clothing that the employer requires to be used or worn [section 27(1)(b) OHSA];
- Identify and manage risks, and develop and implement prevention strategies that eliminate or reduce the risk;
- Create safe work plans;
- Advise an employee of the existence of any actual or potential danger to the health and safety of the employee of which the supervisor is aware [section 27(2)(a) OHSA];
- Take every precaution reasonable in the circumstances to protect employees [section 27(2)(c) OHSA];
- Investigate all cases of alleged violence reported by employees in a fair and timely manner; and
- Promote codes of conduct during each school year and provide employees with appropriate training related to the tasks they perform, in order to assist with recognizing the potential for violent acts and understanding how to deal with violent acts in the workplace.
- Conduct workplace violence risk assessments.
- Investigate reported incidents promptly.
- Communicate risks and updates to Joint Health and Safety Committees (JHSCs).

Principals/Supervisors are reminded to inform their staff about:

- Policies and guidelines related to workplace violence and harassment.
- How to access or summon immediate assistance.
- Potential violent situations.
- Individuals with a violent past in circumstances where the employee can be expected to encounter the violent person in the course of his or her work and the risk of workplace violence is likely to expose the employee to physical injury.
- Safe work plans.
- Workplace violence and harassment reporting procedures as outlined in the Workplace Violence Prevention Policy and Administrative Procedure and Workplace Harassment Policy and Procedure.
- Workplace violence and harassment investigation procedures as outlined in the Workplace Violence Prevention Policy and Administrative Procedure and Workplace Harassment Policy and Procedure.

1.5 Employee Responsibilities:

- Work in compliance with the OHSA and its regulations [section 28(1)(a) OHSA];
- Use or wear equipment, protective devices or clothing required by the employer [section 28(1)(b) OHSA];
- Report the absence of, or defect in, any equipment or protective device of which the employee is aware [section 28(1)(c) OHSA];
- Report any contravention of the OHSA or its regulations, or the existence of any hazard the employee knows of, to the employer or Supervisor [section 28(1)(d) OHSA];
- Not engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct [section 28(2)(c) OHSA]. While this type of behaviour may not constitute workplace violence, it must not be allowed. If allowed to continue, this behaviour may escalate into workplace violence; and
- Complete the mandatory Violence and Harassment in the Workplace online training module within one month of date of hire.
- Cooperate with investigations.

Employees must know how to:

- summon immediate assistance;
- report incidents of workplace violence to the Board and/or their Supervisor;
- work with the employer to investigate and deal with incidents, threats or complaints;
- carry out the measures and procedures that are in place to protect them from workplace violence; and
- carry out any other procedures that are part of this administrative procedure.

1.6 Joint Health and Safety Committee Responsibilities:

- Review reports of workplace violence.
- Recommend improvements to prevent workplace violence.
- Be consulted in risk assessments and program reviews.



1.7 Responsibilities Related to Domestic Violence:

- 1.7.1** Employees must be informed that they can report their concerns to the Principal/Supervisor if they fear domestic violence may enter the workplace. If this occurs, the Principals/Supervisors are responsible for creating an individual safety plan for the employee while they are at work. The safety plan should be developed in consultation with the employee.
- 1.7.2** An employer can become aware of domestic violence when an incident takes place at work or when concern is raised by an employee, co-worker, or someone else. Other indications could be threatening emails or phone calls at work or unwanted visits to the workplace by the aggressor. An employee must advise their Principal/Supervisor if they have applied for or obtained a restraining order that lists a work location as a protected area or requires a person to remain a certain distance from the employee at all times.
- 1.7.3** The Ministry of Labour states that even if the employee does not want any steps taken, the employer may still be required to take some action to protect the employee, depending on the circumstances. Principals and supervisors should work closely with a targeted employee to develop reasonable precautions to address the situation while attempting to respect the employee's privacy and sensitivity of the issue.

2.0 INFORMATION

2.1 Legislative Requirements

- 2.1.1** The OHSA includes workplace violence and workplace sexual violence as a hazard for which employers must develop prevention and response strategies.
- 2.1.2** These procedures support this legislated requirement and the Board's commitment to providing a safe working environment.
- 2.1.3** Under the OHSA, an employer must take every reasonable precaution under the circumstances for the protection of workers, when they are aware, or ought reasonably to be aware, that domestic violence may occur in the workplace and that it would likely expose a worker to physical injury.

2.2 Work Refusal

- 2.2.1** Under the OHSA, an employee can refuse to work if he or she has reason to believe he or she may be endangered by workplace violence [section 43(3)(b.1) OHSA].
- 2.2.2** The Act sets out a specific procedure that must be followed in a work refusal. It is important for all employees, supervisors and Joint Health and Safety Committees representatives to understand and follow this procedure. Teachers, however, cannot refuse work when a pupil's life, health or safety is in imminent jeopardy [section 3(3) of Regulation 857 (Teachers)]. For more information regarding Work Refusal, please refer to the Board's Work Refusal Administrative Procedure 300.21.

2.3 Personal Information Limits

- 2.3.1** The Occupational Health and Safety Act clarifies that employers and supervisors must provide employees with information, including personal information, related to a risk of workplace violence from a person with a history of violent behaviour [section 32.0.5(3)]. However, this duty is limited and applies only when the:
 - Employee can be expected to encounter the violent person in the course of his or her work; and,
 - The risk of workplace violence is likely to expose the employee to physical injury.
- 2.3.1** Employers and supervisors must not disclose more information than is reasonably necessary for the protection of an employee from physical injury.

3.0 Summoning Immediate Assistance

- 3.1** Each school/site of the Board must develop and implement procedures for summoning immediate assistance when an employee is the victim or witness of a violent incident in the workplace, or when a violent incident in the workplace is likely to occur.



- 3.2 Procedures for summoning immediate assistance may vary depending on the circumstances. For example, summoning immediate assistance on a field trip may differ from summoning immediate assistance in a classroom.
- 3.3 Means of summoning immediate assistance include but are not limited to public address (PA) systems, handheld radios (walkie-talkie), phone/cellphone, panic buttons, code words, yelling for assistance from co-workers, and depending on the severity of the actual, attempted, or threatened workplace violence, it may be necessary to contact police or emergency services.
- 3.4 All employees who are expected to respond to the need for immediate assistance must be given instruction on their roles and responsibilities when responding to a violent incident.
- 3.5 The principal/supervisor will ensure that their school/site has sufficient procedures for summoning immediate assistance. If communication devices are used, they must be tested regularly to ensure they are operational and maintained as required.

4.0 Responding to an Act of Violence that Requires Immediate Assistance

4.1 The following immediate action needs to be taken when an Act of Violence occurs that poses an immediate risk of physical injury:

- 4.1.1 Control workplace access.
- 4.1.2 In the case of a critical injury, immediately report the incident to the Health and Safety Coordinator, or in their absence, another member of the Human Resources Department in accordance with the Incident/Accident Reporting procedures. The incident scene is to be preserved until an Inspector from the Ministry of Labour has had an opportunity to view it or to instruct you otherwise. A Joint Health and Safety representative may inspect the place where the injury occurred as indicated in the OHSA [section 8(14)].
- 4.1.3 Call the police when an act or threat of violence in the workplace presents imminent danger.
- 4.1.4 All incidents of violence/threat must be reported to the school's Supervisory Officer.
- 4.1.5 All incidents need to be documented via the Board's Online Reporting System.
- 4.1.6 Consideration must be given as to who needs to be immediately informed (i.e., family members).
- 4.1.7 A list of potential witnesses needs to be developed.
- 4.1.8 In consultation with the Supervisory Officer, or with Senior Management, an initial analysis ought to be conducted which will include a plan for the incident investigation.

5.0 Reporting Workplace Violence – Non-Immediate Assistance

- 5.1 Employees with concerns regarding workplace violence (actual violence, attempted violence, threatened violence) that do not require an immediate response (including concerns about domestic violence that may flow into the workplace) should follow the procedure below:
 - 5.1.1 A person (Complainant) who considers that he/she has been subjected to or witnessed workplace violence, domestic violence, or sexual violence in the workplace, is required and encouraged to report an act of violence and should report the incident via the Board's Health and Safety Reporting System, and to their direct Supervisor immediately and seek any medical or emergency attention if required.
 - 5.1.2 Where a person (Complainant) does not feel comfortable in reporting the matter to their direct supervisor, or in the case where the direct supervisor is alleged to have perpetrated the violent act, the Complainant should report the violence to the next higher level of management, who is in position to provide guidance and assistance with the complaint (i.e. Supervisor, Principal, Manager, Superintendent, Director, Ministry of Labour).
 - 5.1.3 The Resource Person assisting the Complainant will advise the Complainant of the following:
 - 5.1.3.1 The option of requesting the assistance of his/her principal, supervisor, in resolving the complaint. If the principal/supervisor is the person named by the Complainant, the Complainant should request assistance from the next higher level of management.
 - 5.1.3.2 The option of other avenues of recourse such as the right to utilize any applicable provisions of the Collective Agreement, file a complaint with the Ministry of Labour, file a complaint with the Ontario Human Rights Commission, take civil action, or where appropriate, the right to file charges under the Criminal Code.
 - 5.1.3.3 The availability of counseling and other support services provided by the Board;
 - 5.1.3.4 The right to file a formal written complaint under the Workplace Violence Prevention Policy 300.20 when the alleged perpetrator is an employee of the Board;
 - 5.1.3.5 The right to be represented or assisted by a union representative (as outlined in the applicable Collective Agreement) throughout the process;



- 5.1.3.6** The right to withdraw from any further action in connection with the complaint, at any stage (even though the Board may need to continue to investigate the complaint).
- 5.1.4** All incidents or complaints of workplace violence will be kept confidential except to the extent necessary to protect employees, to investigate the complaint, to take corrective action or as otherwise required by law.

6.0 Conducting the Investigation

- 6.1 Following a violent event, the investigation process must be implemented immediately. The immediate supervisor (Principal/Supervisor/Superintendent) of the employee will conduct an investigation and may consult the Health & Safety Coordinator;
- 6.2 Where the immediate supervisor is the subject of the complaint, the next level of management will be responsible for conducting the investigation in consultation with the Health & Safety Coordinator;
- 6.3 The investigation must be fair, impartial and timely.
- 6.4 The principal/supervisor in consultation with Senior Management and, if applicable, the Ministry of Labour will determine whether it is reasonable to reassign employees or students (who may be victims of violent behaviour) while the investigation is in progress. Such transfers and reassignments are administrative measures and are not disciplinary in nature. These decisions may be necessary to ensure the safety of the employee in the workplace and also to ensure the integrity of the investigation.
- 6.5 Until the investigation is completed, the employee shall remain in a safe place as near as possible to his or her workstation and, if applicable, be available to the Ministry of Labour Inspector for the purposes of the investigation.
- 6.6 The Board will provide medical, and counseling support as deemed necessary in the circumstances, consistent with programs described in collective agreements or by Board policy applicable to non-unionized staff.
- 6.7 During the investigation, unionized employees will be advised of their collective agreement rights.
- 6.8 It is critical that all relevant information be obtained; this means that a violent incident or unusual and threatening behaviour needs to be investigated with the people directly involved. This will include the person who reports the violence or the potentially violent circumstances, those to whom the violent behaviour was directed, other witnesses and the person or persons who are alleged to have engaged in violent conduct.
- 6.9 The investigation results should be able to determine:
- What happened (series of events)
 - What provoked the incident
 - If the procedures in place were correctly followed
 - If the intervention measures were appropriate
 - If the existing safety procedures were adequate
 - If the lines of communication were effective
 - If other preventative measures should be implemented
 - If the situation could have been prevented
- 6.10 In conjunction with any discipline that may be imposed, the Board may reassign an employee during or after the Board's investigation, as deemed reasonable under the circumstances.

7.0 Communicating the Results of an Investigation

- 7.1 The results of the investigation will be communicated to the person who reported the circumstances and to others involved in the investigation that reasonably ought to be informed of the results.



7.2 The results of the investigation and any report created in the course of or for the purpose of the investigation is not considered a report relating to occupational health and safety, for the purposes of subsection 25(2) of the OHSA.

8.0 Training and Education

8.1 All employees must complete Workplace Violence Prevention Training annually.

8.2 New employees must complete training during onboarding. Training includes:

8.2.1 Recognizing warning signs;

8.2.2 Strategies for de-escalation;

8.2.3 Reporting and response protocols;

8.2.4 Legal rights and responsibilities under the OHSA and Education Act.

9.0 Confidentiality and Protection from Reprisal

9.1 Confidentiality of all parties involved in a report or investigation must be maintained, except where disclosure is necessary for investigation or corrective action.

9.2 Retaliation against any individual who reports workplace violence in good faith is strictly prohibited.

11.0 Corrective Actions

11.1 In the case where the perpetrator of a violent incident is a staff member, corrective measures may include:

11.1.1 Verbal/written warnings;

11.1.2 Mandatory training or counseling;

11.1.3 Reassignment or modification of duties;

11.1.4 Disciplinary action up to and including termination;

11.1.5 Reporting to police when applicable.



BRANT HALDIMAND NORFOLK CATHOLIC DISTRICT SCHOOL BOARD

WORKPLACE HARASSMENT COMPLAINT FORM

EMPLOYEE INFORMATION:

Employee Name:	
Employee Position:	
Location:	
Date:	
Supervisor Name:	

RESPONDENT INFORMATION:

Respondent Name:									
Respondent Position:									
Relationship of the Respondent to Complainant:	<table><tr><td>Co-worker</td><td>Student</td></tr><tr><td>Parent</td><td>Supervisor</td></tr><tr><td>Principal</td><td>Visitor</td></tr><tr><td>Other:</td><td></td></tr></table>	Co-worker	Student	Parent	Supervisor	Principal	Visitor	Other:	
Co-worker	Student								
Parent	Supervisor								
Principal	Visitor								
Other:									

DETAILS OF ALLEGED HARASSMENT:

Please describe the incident(s) of alleged harassment in as much detail as possible, including details such as but not limited to:

- When the incident(s) took place (dates and times);
- Where the incident(s) happened;
- Who was involved in the incident(s);
- The nature of the incident(s) – specifically what was said or done (words, tones actions);
- Who witnessed the incident(s);
- A verbal/written report of the incident(s) to management (who, when, where, how); and,
- How the incident impacted you.

Please add additional pages if the space insufficient. If applicable, please attach any supporting documentation which is relevant to the complaint or provide a list of any documentation that a witness, other person or the Respondent may have in their possession that is relevant to the complaint.

WITNESS INFORMATION:

Please provide the names and contact information of any witnesses or other person(s) with relevant information to provide about the alleged incident:

ACKNOWLEDGEMENT & SIGNATURE:

I acknowledge that I have read and reviewed the Brant Haldimand Norfolk Catholic District School Board's Workplace Harassment Policy and Administrative Procedure, 300.01.

I understand that I shall not be subject to any adverse treatment as a result of making this complaint, provided that it has not been made for an improper purpose and that I have provided information that I know not be incorrect, untrue, malicious or misleading. To the best of my knowledge, I certify that information provided in this complaint is accurate, true, and complete.

I understand that all incidents or complaints of harassment, including identifying information about individuals involved shall be kept confidential to the greatest extent possible by all parties, except to the extent where it is necessary to reveal details in order to protect employees, to investigate the complaint, to take corrective action or otherwise as required by law. This may include but is not limited providing full disclosure and related information of the complaint to the Respondent during the investigation process.

I acknowledge that in order to preserve the integrity of the investigation process and to protect the interest of all parties, I am required to maintain confidentiality and will not alert or discuss this complaint, or any ensuing investigation, with any employees or witnesses until necessary to obtain advice about their rights.

NAME (Please Print):

SIGNATURE:

DATE:

Please forward this completed form and any additional or supporting documentation in confidence to the Manager of Human Resources at hrmanager@bhncdsb.ca