WORKPLACE VIOLENCE PREVENTION PROGRAM

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1.0 PURPOSE

The University of Waterloo does not condone violent behavior and is committed to providing a safe learning and work environment free of workplace violence through a process of risk assessment and implementation of reasonable safeguards to protect workers, students and visitors. This document supplements the University Policy 34 – Health, Safety and Environment, outlining responsibilities and procedures for responding to threats or actions of workplace violence.

2.0 SCOPE

This program applies to all workers, students, contractors, volunteers and visitors and encompasses all University workplaces and other places where employees, contractors and volunteers work or at University events. **It includes communications made through the use of virtual information and communications technology such as, but not limited to email, messaging apps, social media and video conferencing.**

3.0 DEFINITIONS

Complainant
Refers to the person who is making a complaint.

Domestic violence
Has the same meaning as violence, but the perpetrator and victim are or were in a personal relationship, such as a spouse or former spouse, current or former intimate partner, or a family member.

Respondent
Refers to the person against whom a complaint has been filed.

Risk control
The elimination or reduction of risk associated with an identified hazard.

University events
Activities or events on or off University property, which are organized by the University and under the control of University workers.

Visitor
Anyone attending on University Property or at a University event who is not a student or worker. For the purposes of this program, “visitor” does not include contractors, subcontractors or their workers while onsite at a construction project for which the University is not the constructor or employer as defined under the Act.

Worker
A worker is any one of the following regardless of whether or not financial compensation is given:

- Regular full/part-time
- Casual staff
- Contract staff
- Research assistants
- Teaching assistants
- Faculty
- Visiting scholars and post-docs
- Unpaid learners and volunteers

Workplace harassment
As defined by the Occupational Health and Safety Act (The Act), means engaging in a course of vexatious comment or conduct against a worker in a workplace, **including virtually through the use of information and communications technology**, that is known, or ought reasonably to be known to be unwelcome or is Workplace Sexual Harassment.

Workplace sexual harassment
As defined by The Act, means engaging in a course of vexatious comment or conduct against a worker in a workplace, **including virtually through the use of information and communications technology**, because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. It also includes sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace violence
As defined by The Act, means the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker. It also includes:

- An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.
- A statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker in the workplace that could cause physical injury to the worker.

Workplace
Includes, but is not limited to, University of Waterloo campuses, locations of business, travel and conferences, fieldwork locations and the locations of University events.

4.0 ROLES AND RESPONSIBILITIES

4.1 UNIVERSITY OF WATERLOO

- Ensure that workers have the appropriate information and instruction to protect themselves from violence in the workplace.
- Implement and maintain a notification system and associate procedures to alert workers and students in the case of a specific widespread threat of violence.

4.2 DEPARTMENT HEAD/CHAIR/DIRECTOR

- Identify and manage applicable risk factors for workplace violence in their area through an annual process of risk assessment.
- Assess whether, in particular circumstances, to make information available about a person with a history of violent behaviour and the extent of such disclosure. Guidance should be sought from Human Resources before disclosing any information.
- When aware of, or ought to be reasonably aware, that a domestic situation would likely expose a worker or their co-workers to physical injury within the workplace, take reasonable precautions to protect the workers in the work environment.

4.3 SUPERVISOR/MANAGER

- Assess their workplace for workplace violence hazard.
- Advise workers of any actual or potential hazards related to workplace violence, including situations of persons with a history of violent behaviour or potential domestic situations that could enter the workplace as violence.
- Take all complaints of violence seriously and promptly respond to reports of workplace violence, investigating in accordance with prescribed procedures.
- Document incidents of violence within the workplace through the use of an Incident and Investigation Report.
- Advise affected individuals of resources available to assist them in dealing with the situation which may include Occupational Health, the Employee Assistance Program, the Police and the worker's attending physician.
- Work in conjunction with their departmental health and safety representative/ coordinators and the Safety Office to ensure that steps are taken to reduce the risk of future similar violent situations.
- When aware, or ought to be reasonably aware, that a domestic situation would likely expose a worker or their co-workers to physical injury within the workplace, take reasonable precautions to protect the workers in the work environment.

4.4 FACULTY ASSOCIATE DEANS

- As per s. 5.4.2, conduct investigations where a complaint of workplace violence involves a student as the respondent.
- Advise the Safety Office of reported incidents under University Policy 71 – Student Discipline that may meet the definition of workplace violence.

4.5 SAFETY OFFICE

- Monitor the Workplace Violence Prevention Program for effectiveness on an ongoing basis.
- Review this program **annually** with the Joint Health and Safety Committee (JHSC), making changes as appropriate.
- **Report incidents determined to be workplace violence to the JHSC at JHSC meetings.**
- Provide JHSCs annually an anonymized aggregate report of workplace violence incidents.
- Facilitate a process of annual assessment of risk factors associated with workplace violence.
- Receive reports of possible workplace violence, and notifies UW Special Constable.
- Be a part of the assessment team that evaluates reports of workplace violence.
- Manage investigations of reported workplace violence with the exception of those identified in Section 4.4.
- Evaluate reports of violence and threats of violence in conjunction with UW Special Constable and advise department heads of necessary actions.
- Assess whether in particular circumstances to make information available about a person with history of violent behaviour, and the extent of such disclosure.
- Provide information to a worker about a person with a history of violent behaviour if the worker could be expected to encounter the person in the course of their work and there is a risk of workplace violence likely to expose the worker to physical injury. Guidance should be sought from Human Resources before disclosing any information.
- In conjunction with UW Special Constable, develop personal safety plans.
- Support employees and students with respect to personal safety issues stemming from threats or actions of violence.

4.6 JOINT HEALTH & SAFETY COMMITTEE (JHSC)

- Receive and review reports of workplace violence incidents.

- Review this program annually.

4.7 HUMAN RESOURCES

- Be part of the initial assessment team which evaluates reports of workplace violence.
- Receive and manage referrals of situations not considered workplace violence.
- Receive investigation reports and be consulted on any follow up action.

4.8 UW SPECIAL CONSTABLE SERVICES

- Respond to reports of workplace violence and notifies the Safety Office of occurrences.
- In conjunction with the Safety Office, develop personal safety plans.
- Liase with local Police authorities where appropriate.

4.9 WORKERS

- Foster an environment free of workplace violence.
- Notify their supervisor of every potential situation of violent acts or threats directed at a worker, between workers or by a worker towards a student or a member of the public.
- Provide input as requested to assess specific risks for their faculty/department and review/revise the assessment as necessary.
- Disclose threats made towards them by family members, or individuals with whom they are in a relationship, which may spill into the workplace.

4.10 STUDENTS

- Report instances of violence or threats to their Associate Dean or, if the violence or threat thereof is occurring within their residence, to their Residence Life staff

5.0 PROCEDURES

5.1 RISK ASSESSMENT & GENERAL CONTROLS

Risk assessment identifies the potential for violence that may arise from the nature of the workplace, the type of work or the conditions of work. The responsibility for risk assessments shall rest with the department. The Safety Office will facilitate the process through the Risk Assessment Program.

When doing risk assessments, departments will consider the following risk factors:

- Working alone
- Dealing with highly sensitive or controversial personal matters or making decisions which impact academic or employment status

- Providing services directly to members of the public or working in a community-based setting
- Handling, securing or protecting cash or other tangible valuables, including narcotics or other drugs
- Patrolling and responding to security conditions and providing protective services
- Dealing with unstable/volatile individuals
- Transporting people or goods

Department Heads/Chairs/Directors or designates, will review all positions under their area of responsibility to determine if job duties involve one or more of the risk factors.

The Risk Assessment Program outlines the framework and approach to manage health and safety risks in University workplaces. The risk assessment shall involve input from those directly involved with the risk factors identified. Past instances of reported workplace violence must be given consideration.

Individual departments are responsible for assessing and managing risks associated with workplace violence. The following are some examples of controls:

- Standard operating procedures
- Work alone procedures
- Physical barriers
- A means of summoning immediate assistance (notification systems, panic buttons)
- Training (e.g., verbal de-escalation training)
- Access control
- Security cameras

The University controls the risk of workplace violence through general avenues, such as,

- Security patrols
- CPTED (crime prevention through environmental design) audits and semi-annual evening safety walks around residence buildings
- Regroup Mobile – an electronic notification system for campus safety and emergency resources, including emergency contact information, a personal safety toolbox including flashlight and alarm, a Work Alone tool, and safety and emergency resources.

In some cases, an individual may present a threat of violence to workers or to the broader University community. The University has centralized structures in place to identify, assess, monitor and manage such threats. When it becomes known that an

individual or a situation may present a threat of violence, the Safety Office will initiate a risk assessment.

5.2 RIGHT TO REFUSE UNSAFE WORK

A worker may refuse to work when they have reason to believe that workplace violence is likely to endanger their safety. Workers who exercise their right to refuse unsafe work shall report immediately to their supervisor the reason for the refusal. Review the Unsafe Work Refusal web page for more information.

5.3 RESPONDING TO WORKPLACE VIOLENCE

5.3.1 SUMMONING IMMEDIATE ASSISTANCE

Workers may on occasion interact with individuals who are agitated and or confrontational.

If it is safe to do so, first, attempt to de-escalate the individual verbally. If it is not possible to de-escalate the situation verbally, workers should summon additional assistance in accordance with departmental procedure (if any). Various ways assistance can be requested include:

- Panic buttons
- Calling 911 from any phone
- Campus phones – UW Special Constable can be reached at extension 22222 or by calling 519-888-4911
- Campus pay phones are equipped with a no charge, direct dial button to UW Special Constable

If the situation becomes violent, or you are notified of a violent situation on campus, the principles of **Get Out, Hide, Fight**, apply, and the Emergency Procedure – Violent Situation on Campus should be followed. If safe to do so, leave the situation immediately, hide if it is not safe to get out and fight only as a last resort. When it is safe to do so, call 911 immediately or UW Special Constable Services at ext. 22222, or 519-888-4911. Obtain medical assistance as necessary either through a first aid trained person, or by calling 911.

The worker shall notify their department head or manager as soon as possible.

5.3.2 NON-IMMINENT SITUATIONS

All workers have an obligation under the Occupational Health and Safety Act to report incidents of workplace violence experienced or witnessed. Workers who believe they have been subjected to workplace violence must report the incident to their immediate supervisor. If this is not possible, reports can be made to another department supervisor. All incidents of workplace violence must be investigated.

5.3.3 INCIDENT FOLLOW-UP

Workers who experience an incident of violence that is traumatic may require emotional support from a professional. Support services are available through the Employee and Family Assistance Program.

After a violent incident occurs, it is important to review the safety protocols in place to ensure their effectiveness. The department, in consultation with the Safety Office, if appropriate, shall:

- Review the incident which occurred.
- Consider the need for immediate risk mitigation steps, e.g. individual safety planning
- Outline what corrective or remedial actions are necessary to prevent or minimize the impact of repeat occurrences.
- Identify new or previously unidentified risks and reassess.
- Review employee training and education programs and determine if they are adequate or if additional training should be provided.

A summary of this review will be provided to the Safety Office on completion.

Following an incident of immediate threat, students have resources available to them to help debrief the situation. These resources include:

- Campus Wellness Counselling Services – available to all students, Campus Wellness provides mental health services using an inclusive, connected, and collaborative approach.
- Residence Life Coordinators

5.4 INVESTIGATIONS

5.4.1 EMPLOYEES

When a report of workplace violence is received, the supervisor must gather information on the circumstances of the situation. Initial documentation will be in the form of an Incident and Investigation Report form, which will be submitted to the Safety Office. On receipt of the form, the Safety Office will advise UW Special Constable of the potential of any criminality and convene a meeting of an assessment team. One representative from the complainant's department, Human Resources and the Safety Office will assess if the report constitutes workplace violence. The Safety Office will inform the complainant in writing of the results of the assessment along with the respondent if an investigation will be undertaken. UW Special Constable may pursue their own investigation of the matter under the Criminal Code.

If the assessment determines the reported activity is outside the scope of the definition of workplace violence, the assessment team may refer the matter to other departments,

such as Human Resources or the Conflict Management and Human Rights Office [the Director of Complaints Management].

If the outcome of the assessment is that the reported activity is within the scope of the definition of workplace violence an investigation will be initiated and normally completed within ten business days. The Safety Office will lead the investigation with support from the complainant's department. The investigators will interview the complainant, respondent and any witnesses separately. It may be necessary for the investigator to re-interview any of the parties.

Any worker, whether complainant, respondent, or witness is entitled to invite one support person to accompany them to an investigation interview. This person may be a representative from the worker's union or association (CUPE, UWSA, FAUW, GSA). If the employee does not have representation from an association or union, representation may be allowed through a colleague or another member of the campus community. The support person's role will be limited to support, and that person will not be permitted to speak on behalf of the person being interviewed.

The investigator will prepare and submit a report summarizing the facts and findings normally within ten business days of initiating the investigation and conclude whether there is:

- Sufficient evidence to substantiate a finding of violation of the Policy 34;
- Insufficient or lack of credible evidence to substantiate a finding of violation of Policy 34;
- No credible evidence to substantiate a violation of Policy 34.

Copies of the investigator's full report will be distributed to the following recipients:

- Human resources partner for both the complainant and the respondent Department head (or designate) for both the complainant and respondent (if different)
- A summary report of the investigation's finding will be distributed to:
- Complainant
- Respondent

Where a complaint is lodged by more than one complainant or is against more than one respondent, the complainant or respondent, as the case may be, shall receive only the portions of the findings applicable to their specific complaint/response.

If the investigation concludes there is a lack of credible evidence to substantiate a finding of violation of Policy 34, or the event is outside the scope of workplace violence, the investigator may make recommendations for further evaluation or management of the situation under other University policy.

As applicable, a copy of the outcome will be provided to the union or association of which the complainant and respondent are members.

Based on the investigator's findings, the department head or designate, in consultation with Human Resources and/or other University officials, as relevant, shall determine whether further action is warranted (including any corrective actions) and advise the complainant, respondent and the Safety Office of such in writing within 10 days of receiving the investigator's report.

Any of the parties may request a formal review of the decision of the department head in accordance with Policy 36 – Dispute Resolution for University Support Staff; Article 9 – Faculty Grievances of the FAUW Memorandum of Agreement; Article 16 – CUPE Local 793 Collective Agreement or Policy 72 – Student Appeals.

5.4.2 NON-EMPLOYEES

In the event a report of workplace violence identifies a student as the respondent, the Associate Dean for the student's faculty shall conduct the investigation. Any discipline will be administered in accordance with University Policy 71 – Student Discipline.

Incidents and the results of investigations will be summarized and provided to the Safety Office, who will advise the complainant of the outcome

A worker subjected to violence by a visitor should report it to his/her supervisor. Students subjected to violence by a visitor should report it to UW Special Constable Services.

Where a report of violence is made, and the respondent is not a worker or student, the matter will be referred to UW Special Constable Services for investigation. UW Special Constable Services will manage the investigation, communicating in writing the results to the Safety Office.

Visitors who are subjected to violent behavior by a University worker should report it to their identified University contact and/or Special Constables for investigation into employee conduct.

5.4.3 INTERIM MEASURES

During an investigation, interim measures may be necessary to ensure the safety of the parties and the integrity of an investigation. These may include the suspension or temporary relocation of the respondent or other personal safety measures for the complainant.

5.5 DOMESTIC VIOLENCE

Workers experiencing domestic violence that would likely expose them or other workers to physical injury in the workplace can be assured that the University will take every precaution reasonable to protect them and their co-workers in these circumstances. This may include some or all of the following:

- Creating a safety plan and establishing enhanced security measures.
- Setting up priority parking or providing escorts to an employee's vehicle or to public transportation.
- Adjusting a worker's working hours and work location so that they are not predictable.
- Facilitating worker access to counselling through the Employee Family Assistance Program or other community programs.

The University appreciates the sensitivity of these issues and will do its best to assist employees as discreetly as possible while maintaining their privacy.

5.6 PERSONS WITH A HISTORY OF VIOLENCE

The University must also take every reasonable precaution to protect workers from workplace violence, including evaluating a person's history of violent behavior to determine whether and to whom this person poses a risk. In making this evaluation, the University will consider:

- Whether the person's history of violence was associated with the workplace or work
- Whether the history of violence was directed at a particular employee or employees in general
- Any other information relevant to the circumstances

In certain circumstances, the University may have a duty to provide information about a risk of workplace violence from a person with a history of violent behaviour if a worker can be expected to encounter that person during the course of their work, and is likely to be exposed to the risk of physical injury. The University will only release as much personal information about the person as is reasonably necessary to protect the employee from physical injury.

5.7 NO REPRISAL

This program prohibits reprisals against workers who have made complaints of workplace violence in good faith or provided information regarding a complaint or incident of workplace violence.

Reprisal includes:

- Any act of retaliation that occurs because a person has complained of or provided information about a reported incident of workplace violence.

- Intentionally pressuring a person to ignore or not report an incident of workplace violence.
- Intentionally pressuring a person to lie or provide less than full cooperation with an investigation of a complaint or incident of workplace violence.

Although false or frivolous accusations of workplace violence are rare, malicious or bad faith accusations (where a person has made a complaint knowing it was untrue) are serious offences as they may have serious consequences for the accused.

A worker who engages in a reprisal or makes a malicious complaint under this program may be disciplined up to and including dismissal from employment. Such discipline is not a reprisal nor a breach of this program.

5.8 CONFIDENTIALITY

Information provided to individuals responsible for implementing actions under this program will be treated with utmost discretion and confidentiality. All reports made under this program shall be considered confidential to the parties involved and those responsible for the investigation and resolution of the incident. It may not be shared with others, except as necessary to protect the health and safety of the members of the University Community, to investigate a report or complaint, or as otherwise required by Canadian Law. The identities of all complainants and witnesses, and the nature of the complaint shall be kept confidential.

Reporting to the Joint Health and Safety Committee, where required by The Act, will be done in a manner that protects the privacy of the involved individuals as much as possible and any information received by the Joint Health and Safety Committee shall be considered confidential to the members.

6.0 RECORD KEEPING

The Safety Office will hold all documentation pertaining to reports of violence and any investigations. Records kept will include:

- A copy of the complaint or details about the incident in the form of an Incident/Injury Report and Investigation Form.
- A record of the investigation including notes.
- A copy of the investigation report.
- A summary of the results of the investigation that was provided to the complainant and respondent
- A copy of any corrective action taken to address the complaint.

All records of the investigation will be kept confidential. The investigation documents, including the report, should not be disclosed unless necessary to investigate an incident or complaint, to take corrective action, or as otherwise required by law.

Records will be kept for five years [classification HS04].

7.0 TRAINING

- All workers shall take SO1081 Workplace Violence Awareness.
- Verbal De-escalation training, SO1181, is available to all employees
- Training records will be kept in Workday.

8.0 RECORD OF REVISIONS

Date of Review	Author/Editor	Change	Version
March 2025	Andrew Scheifele	• Expanded scope statement to incl. virtual technology • Updated harassment definitions to reflect current legislation • Simplified Roles and Responsibilities to align with the HSEMS • Adjusted the frequency of the program review to annually • Added regular reporting of incidents of workplace violence to the JHSC • Deleted reference to Blue Safety Poles in Section 5.3 • Added new training course, Verbal De-escalation in Section 7.0	Workplace Violence Prevention Program v.2.2 MAR2025
March 2024	Andrew Scheifele	• Updates to risk factors and controls • Clarification on procedures	Workplace Violence Prevention Program v.2.1 MAR2024
October 2021	Andrew Scheifele	No changes	Workplace Violence Prevention Program v.2.0 OCT2021
October 2020	Andrew Scheifele	• Updated section 4.0 Roles and Responsibilities • Updated section 5.0 Procedures	Workplace Violence Prevention Program v.2.0 OCT2020
January 2018	Andrew Scheifele	No changes	Workplace Violence Prevention Program v.1.0 JAN2018