



**SECTION:** Health and Safety

**POLICY:** HS 07

**DATE:** June 2025

**PAGE:** 1 of 7

Formerly the Workplace Harassment and Violence Policy  
December 2022; December 2017; October 2015; June 2013

---

## WORKPLACE ANTI-VIOLENCE POLICY

---

### PREAMBLE

This policy and program are intended to:

- Ensure that Contact Brant maintains a work environment that is free from workplace violence.
- Establish measures and procedures to control the risk of workplace violence.
- Communicate the procedure for summoning immediate assistance in the event of an incident of workplace violence or where an incident is imminent.
- Establish a procedure for reporting incidents of workplace violence.
- Establish how reports of workplace violence will be dealt with and investigated by the organization.

Definitions: As defined by the Ontario Occupational Health and Safety Act:

*Workplace Violence* 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
- An attempt to exercise physical force against a worker in a workplace that could cause physical injury to the worker
- A statement or behaviour that it 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.

*Workplace* refers to any land, premises, location, or thing at, upon, in or near which a worker works including the organization's offices, off-site locations where work is performed, social events related to work or away from work but resulting from work (i.e., a threatening phone call to your home or another personal electronic contact from co-workers or clients).

### POLICY

Contact Brant is committed to providing a healthy, safe, and supportive work environment for all employees that is free from workplace violence and will not tolerate any such incidents that are perpetuated by or against an employee, client, volunteer, or visitor.

Contact Brant will take all reasonable steps to prevent workplace violence and will deal with incidents and complaints made in good faith in a fair, consistent, and timely manner.

## **PROCEDURES**

### **1. Employee Responsibilities:**

- Understand what constitutes workplace violence as defined in this policy and adhere to the organization's zero-tolerance requirement.
- Immediately report any incident of violence one is subject to or witnesses in accordance with the organization's anti-violence program.
- Participate as required in internal and external investigations concerning incidents of workplace violence.
- Refrain from any retaliatory acts against any individual who has brought forward a complaint of violence.
- Attend and actively participate in training and education sessions regarding workplace violence.

### **2. Employer/Management Responsibilities:**

- Assess the risk of workplace violence and implement procedures, response plans and other controls to help minimize identified risks.
- Educate and train employees on this policy and program, response plans and other controls established to protect employee health and safety.
- Ensure a copy of this policy is available to all employees.
- Review the Workplace Anti-Violence Policy and Program annually or as often as necessary to properly protect employees from the risk of violence. This policy and program will be reviewed after any violent incident to determine if changes are necessary.
- Take appropriate action(s) upon receipt of a complaint of workplace violence or when aware that workplace violence is occurring.
- Impose appropriate disciplinary measures in response to substantiated claims of workplace violence.

3. All members of management who are aware, or who ought to reasonably be aware that incidents of workplace violence are occurring or are thought to be occurring, are obligated to take appropriate action to stop the offending behaviours and actions, even in the absence of a formal complaint.

## **Workplace Anti-Violence Program**

### **4. Reporting Incidents of Workplace Violence:**

- 4.1. In the event you are directly affected by or witness to an act of violence or a threat of violence in the workplace, it is imperative that the incident be reported immediately. Reports are to be made to your manager, another manager, or the CEO, or other relevant parties.
- 4.2. For the health and safety of everyone, employees are encouraged to request an

informal meeting with their supervisor to discuss issues concerning or related to workplace violence.

4.3. Employees should notify their supervisor or CEO if any restraining order affecting them is in effect or if they are aware of a non-work-related situation that could result in violence in the workplace, including concerns regarding the potential for domestic violence to occur in the workplace.  
(For further information regarding concerns of domestic violence, please refer to section 10.)

4.4. If an employee is subject to workplace violence, they also have the option to pursue recourse through the Provincial Police or the Federal Criminal Code.

5. Summoning Immediate Assistance:

5.1. If you require immediate assistance following an act of violence, are being threatened, or consider yourself to be in imminent danger, contact the police/emergency services immediately by dialling 9-1-1 and follow emergency response procedures where relevant.

5.2. If you are unable to phone 911 right away, you should:

- Yell for help.
- If in a vehicle, honk the horn repeatedly, turn on hazard lights and lock all vehicle doors.
- If possible, use the vehicle's emergency alarm.
- Immediately move to a safe location.
- Contact the CEO or another manager.

6. Right to Refuse Unsafe Work Due to Workplace Violence: If you believe that you are being endangered by workplace violence, you have the right to refuse to perform the work you deem to be unsafe. If you are refusing to work because of workplace violence, you must immediately report the refusal to your supervisor or their designate.

7. Once reported, an investigation into the refusal will commence. During the investigation, you must remain in a safe place that is as near to your work location as reasonably possible and must remain available to the investigator for the purpose of the investigation. Refer to the *Right to Refuse Unsafe Work Policy*.

8. History of Violent Behaviour: Under the Ontario Occupational Health and Safety Act, Contact Brant may be required to provide information (including personal information) to its employees about a person with "a history of violent behaviour" if:

- The employee can reasonably be expected to encounter that person in the course of their work; and
- There is a potential risk of workplace violence because of exposure to the individual with a history of violent behaviour.

Pursuant to this obligation, if Contact Brant is of the view that there is a risk of workplace violence such that an employee is likely to be exposed to physical injury, information that is deemed reasonably necessary to protect employees from physical injury, including personal information and any known triggers of the individual's potentially violent behaviours will be communicated.

9. When disclosing personal information, Contact Brant will limit as much as possible the amount of personal information provided and will not release any medical information that is deemed protected. Contact Brant will not disclose any information to individuals who are unlikely to encounter a person with a history of violence or to those who are not at risk of physical injury from that person.
10. Domestic Violence: In the event Contact Brant is aware that domestic violence could likely expose an employee to physical injury in the workplace, it will take every precaution reasonable in the circumstances for the protection of the affected employee(s). In such situations, the CEO will work with the employee to create a personal support plan which will identify safety measures and procedures for the protection of the individual.
11. Violence Risk Assessment: Contact Brant will conduct a risk assessment of the work environment to identify any issues related to potential violence that may impact the organization and its employees and will institute measures to control those risks. When conducting the risk assessment, Contact Brant will take into consideration specific areas that may contribute to the risk of violence, including:
  - Working in a community-based setting;
  - Interaction with the public and/or working with unstable or possibly volatile clients (Refer to the *Staff Safety Policy*)
  - The exchange of money;
  - Working alone or in small numbers;
  - Working at night;
  - Working in a high crime area.

As part of its assessment, Contact Brant may review records and reports (incident reports, health and safety inspection reports, etc.). The results of the assessment will be provided to the Joint Health and Safety Committee.

12. Violence Investigation Procedure: The investigation process will be initiated upon receipt of a formal complaint from an employee or at the discretion of the employer where workplace violence is known or is suspected to be occurring. Contact Brant will endeavor to complete investigations within 90 calendar days or less once the process has been initiated; unless extenuating circumstances warrant a longer investigation (for example where more than five witnesses must be interviewed or in the event a witness, Complainant or Respondent is unavailable due to illness). Once initiated, the investigation procedure will generally adhere to the following steps/guidelines:
  - 12.1. Contact Brant will appoint an internal or external investigator(s) to promptly conduct and document an investigation into the incident in which all facts are examined in a manner that is timely, fair, and impartial.
    - No person shall be appointed to the role of investigator where they have been named within a complaint.
    - Any allegations against the CEO will be investigated by a neutral third-party investigator.
  - 12.2. The investigator(s) will review this policy, the submitted complaint and supporting documents, and will meet with the Complainant to gather

additional details and information regarding the incident(s).

- 12.3. Individual(s) named in the complaint (known as Respondents) will be advised via written notification of the complaint that has been filed against them. The notification will inform the Respondent of the alleged offensive action(s)/behaviour(s) made against them.
- 12.4. The investigator(s) will then meet with the Respondent to allow the individual to respond to the presented allegations and to gather facts and information.
- 12.5. Where warranted, Contact Brant may issue a paid administrative leave to the Respondent, Complainant and any other party deemed necessary until the investigation is completed.
- 12.6. Employees on paid administrative leave pending the results of the investigation must remain available to meet with the investigator(s) and to return to work as requested.
- 12.7. The investigator(s) may also individually meet with witnesses, and any other individual deemed necessary to provide additional evidence or context/information pertinent to the investigation.
- 12.8. Once the investigator(s) is satisfied with the amount of information collected from all parties, they will make a determination as to whether or not the allegation(s) are substantiated based on a balance of probabilities and, where substantiated, make recommendations on any remedial action to be taken.
- 12.9. *Investigation Report:* The investigator will provide an investigation report which must include a summary of the steps taken during the investigation, the complaint and allegations of the Complainant, the response from the Respondent(s), the evidence of any witnesses, any additional evidence gathered, findings of fact, the conclusion of the investigation and any recommendations made.
- 12.10. If the investigator deems a breach of the policy has occurred, Contact Brant will take necessary corrective action where deemed appropriate to do so.
- 12.11. If the results of the investigation do not substantiate that a breach of this policy has occurred, the allegations will be disregarded in any subsequent employment decision affecting the parties involved.
  - This is the case except where there is a repetition of the same allegation from the same or different parties, and in that case, further investigation and corrective action may occur.
  - If after investigating any complaint, Contact Brant determines that the complaint is not genuine or that an employee has deliberately provided false information regarding the complaint, disciplinary action may be taken against the Complainant or the individual who gave the false information.
- 12.12. If the Complainant disagrees with the outcome of the investigation, they will

have the option to pursue recourse through the applicable legislation (example: The Human Rights Code or the Occupational Health and Safety Act).

- 12.13. Contact Brant will provide the Complainant and Respondent (where the Respondent is an employee) with a written outcome letter summarizing the investigation findings and any disciplinary action to be taken because of the investigation.
- 12.14. All parties involved in the investigation process, including the Complainants, Respondents, and witnesses, are responsible for fully cooperating with the investigator(s) throughout the investigation process.
13. Prohibition Against Retaliation/Reprisal: Contact Brant strictly prohibits any form of retaliation against an employee for filing a genuine complaint under this policy or for participating in the investigation process. Specifically, no employee shall be demoted, dismissed, disciplined, or denied a promotion, advancement, or other opportunities because they have lodged a complaint in good faith or have participated in an investigation.
14. Disciplinary Action: Any employee who is found to have breached this policy by engaging in violence or a form of reprisal; who breaches confidentiality expectations; fails to cooperate with an investigation; makes a complaint in bad faith, or supplies falsified information will be subject to appropriate disciplinary action.  
  
Disciplinary action may range from training, counselling, written warning, suspension, work transfer and termination of employment, depending on individual circumstances. Additionally, the organization may pursue criminal charges where warranted.
15. Confidentiality: Contact Brant will ensure that information and documents regarding a complaint or incident will not be disclosed except to the extent necessary to protect workers, to investigate the complaint or incident, to take corrective action or as otherwise required by law.
  - 15.1. All parties involved in a workplace violence complaint, including complainants, respondents, witnesses, managers, and support persons, are expected to treat the matter and any information they become aware of as confidential. No party shall discuss the matter or associated details with other employees or witnesses. An employee may face disciplinary action if it is determined that they have failed to adhere to these confidentiality expectations.
  - 15.2. All investigation notes and full reports will be retained in a separate file and are not to be saved in employee personnel files. Investigation outcome letters and disciplinary action will be saved in applicable employee files only when the complaint has been verified and is found to be in breach of this policy.
16. Record Keeping: The CEO will securely retain records of all complaints or incidents of harassment including copies of:
  - The complaint or details about the incident
  - Records of the investigation, including notes

- Witness statements, if taken
- The investigation report, if any
- Results of the investigation that were provided to the Complaint and Respondent
- Any corrective action is taken to address the complaint or incident of workplace harassment.

17. Reports of Violent Incidents - Workplace Expectations: Contact Brant shall:

- Promptly investigate all reported acts and incidents of violence.
- Consult with other parties (i.e., legal counsel, Health and Safety Consultants, Health and Safety Representatives, Employee Assistance Providers, Human Rights, and local Police Services) as deemed necessary to address, resolve and mitigate incidents.
- Take all reasonable measures to identify and eliminate risks and root causes resulting from the incident.
- Comply with WSIB and OHSAA violent incident reporting obligations by:
  - Immediately notifying the Ministry of Labour and the Joint Health and Safety Committee (JHSC) of any incident resulting in the death or critical injury of an employee, and providing the Director of the Ministry of Labour with a written report detailing the circumstances of the incident within 48 hours of its occurrence.
  - Providing written notification to the JHSC within four days of any violent incident leaves of an employee disabled from performing their job duties or which requires medical attention.
  - Providing notification to the WSIB within 24 hours of any violent incident in which an employee sustains a lost-time injury past the day of the incident or an injury that requires health care.