



The Corporation of the Town of Tecumseh

Policy Manual

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Subject: **Violence and Harassment in the Workplace**

Definitions

As defined in the Occupational Health & Safety Act of Ontario (OHSA):

- 1.0 The term "worker" when used in this Policy shall mean all employees of The Corporation of the Town of Tecumseh (Corporation) including all supervisory and managerial personnel, members of Council and employees of consultants or contractors.
- 2.0 The term "employer" when used in this Policy shall mean a person who employs one or more workers or contracts for the services of one or more workers and includes an owner, constructor, contractor or subcontractor to perform work or supply services.
- 3.0 The term "supervisor" when used in this Policy shall mean a person who has charge of a workplace or authority over a worker.
- 4.0 The term "workplace" when used in this Policy shall mean any land, premises, location or thing at, upon, in or near which a worker works.
- 5.0 The term "workplace harassment" when used in this Policy, shall mean:
 - 5.1 engaging in a course of vexatious, comment or conduct against a worker in the workplace that is known or ought reasonably be known to be unwelcome, and include

- 5.2 workplace sexual harassment.
- 6.0 “Workplace harassment” – a reasonable action taken by an employer or a supervisor relating to the management and direction of workers or the workplace is not workplace harassment.
- 7.0 The term "workplace sexual harassment" when used in this Policy shall mean,
 - 7.1 engaging in a course of vexatious comment or conduct against a worker in a workplace 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, or
 - 7.2 making a 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.
- 8.0 The term "workplace violence" when used in this Policy, shall mean:
 - 8.1 the exercise of physical force by a person against a worker, in the workplace, that causes or could cause physical injury to the worker,
 - 8.2 an attempt to exercise physical force against a worker, in the workplace, that could cause physical injury to the worker,
 - 8.3 a statement or behaviour 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.

Statement of Policy

- 9.0 The Corporation is committed to the early identification of and prevention of workplace violence and workplace harassment and to taking all reasonable precautions to protect workers from same.
- 10.0 All allegations of workplace violence and workplace harassment will be investigated.
- 11.0 Any form or manner of workplace violence and workplace harassment will not be tolerated. Employees who are found to have engaged in such conduct will be subject to disciplinary action up to and including the termination of their employment.
- 12.0 In the event the Corporation becomes aware that domestic violence that would likely expose a worker to physical injury may occur in the workplace, every precaution reasonable in the circumstances for the protection of the worker shall be taken.

13.0 In the event the Corporation becomes aware of information:

- 13.1 that is related to a risk of workplace violence from a person with a history of violent behaviour, and
- 13.2 a worker can be expected to encounter the person in the course of his or her work, and
- 13.3 the risk of workplace violence is likely to expose the worker to physical injury,

information with respect to the risk shall be given to the worker, including such personal information as is reasonably necessary to protect the worker from physical injury.

14.0 A worker has the right to refuse to work where the worker has reason to believe that workplace violence is likely to endanger the worker.

Coordinator

15.0 The Director Corporate Services & Clerk is hereby designated as the Corporation's Workplace Co-ordinator (Co-ordinator) with respect to workplace violence and harassment. The Co-ordinator's duties shall include:

- 15.1 the preparation of an initial assessment of the risks of workplace violence and re-assessment of the risks of workplace violence as often as is necessary to ensure the continued protection of workers from workplace violence;
- 15.2 the development and maintenance of the Corporation's Workplace Violence and Harassment Program;
- 15.3 the provision of information to workers and instruction of workers on both the Policy and Program; and
- 15.4 carrying out those duties specifically assigned to the Co-ordinator in the Program.

General Duties – Compliance and Reporting

16.0 All workers have a duty to act at all times in compliance with the Policy and Program.

17.0 All workers shall immediately report all acts of workplace violence and workplace harassment to the Co-ordinator and/or Supervisor.

18.0 If the Co-ordinator is the alleged harasser, the employee may report the incident to the Chief Administrative Officer (CAO).

- 19.0 If the alleged harasser is a Member of Council, the Coordinator shall direct the complaint to the Integrity Commissioner for investigation, in accordance with the Code of Conduct Policy No. 63 for Members of Council.
- 20.0 If the CAO is identified as the alleged harasser, then the Coordinator shall engage a third party who is qualified because of knowledge training and experience to conduct the investigation.
- 21.0 If both the CAO and Coordinator are the alleged harassers, the employee shall report the incident to Dunk & Associates by email to professionalsupport@systems24-7.com or by phone 1-866-754-8839, who shall in turn on behalf of The Corporation of the Town of Tecumseh contract a third party who is qualified because of knowledge training and experience to conduct the investigation.
- 22.0 In the event that the allegation is made against the CAO by the Co-ordinator, the Co-ordinator shall report the incident to Dunk & Associates by email to professionalsupport@systems24-7.com or by phone 1-866-754-8839, who shall in turn on behalf of The Corporation of the Town of Tecumseh contract a third party who is qualified because of knowledge training and experience to conduct the investigation.
- 23.0 In the event the Co-ordinator alleges harassment by an employee, the Co-ordinator shall report the incident to the CAO.
- 24.0 All workers shall immediately report information in their possession that domestic violence that would likely expose a worker to physical injury may occur in the workplace.
- 25.0 All workers shall immediately report risks of workplace violence from a person with a history of violent behaviour where a worker can be expected to encounter the person in the course of their work and the risk of workplace violence is likely to expose a worker to physical injury.

Review and Posting of Policy

- 26.0 This Policy shall be reviewed, in consultation with the Joint Occupational Health & Safety Committee (JHSC), as often as is deemed necessary, but at least yearly, and shall remain posted in a conspicuous place at all times.

Tony Haddad
Chief Administrative Officer

Date

Appendix A – Violence and Harassment in the Workplace Procedures

Scope

- 1.0 This Violence and Harassment in the Workplace Procedure supports The Corporation of the Town of Tecumseh's (Corporation) Violence and Harassment in the Workplace Policy by outlining specific preventative actions to discourage and prevent acts of violence in the workplace before they occur. The procedure further outlines corrective measures to be taken in the event acts of violence or harassment occur in spite of all reasonable effort to prevent them and the measures that can be taken to support employees who are affected by such violence.
- 2.0 For definitions see the Violence and Harassment in the Workplace Policy.

Purpose:

- 3.0 The Corporation is committed to providing a safe and healthy work environment. Integral parts of achieving this goal are the design of work practices, operational procedures and staff training programs to prevent workplace violence and harassment.

Responsibility:

- 4.0 Everyone is responsible for creating and maintaining a safe workplace to the extent of each person's authority and ability to do so. It is the responsibility of every employee of the Corporation to assist and cooperate in making the workplace as safe and secure as possible.
- 5.0 This policy applies to all employees of the Corporation, including but not limited to regular, temporary and contract employees, students, volunteers and interns.
- 6.0 Members of the general public, visitors to the Corporation's facilities, or individuals conducting business with the Corporation, are expected to refrain from any form of violence and harassment. The Corporation will take any necessary steps to ensure a workplace free from violence and harassment.
- 7.0 Since all employees have the right to work in an environment free from violence and harassment, all employees share the responsibility to support a violence and harassment free workplace.

Specific Responsibilities:

Workplace Safety Section (Corporation & JHSC)

- 8.0 Will actively monitor industry standards and available current information on "Violence and Harassment in the Workplace Prevention" issues and provide

- information to and consult with department management to allow for the most effective implementation of Violence and Harassment in the Workplace Prevention programs;
- 9.0 Will participate in the investigation of reported violence and harassment incidents in the workplace, as requested, and will assist department management and the JHSC in implementing proper programs/controls in response to such incidents;
 - 10.0 Will review, analyze and track all reported incidents of violence and harassment in the Corporation's facilities and operational activities; and
 - 11.0 Will review and provide input on all work practices, operational controls and training programs as many are developed by departments to address specific department needs.

Departments

- 12.0 Departments are responsible for implementing this procedure and for establishing specific program modules and controls to prevent incidents of violence and harassment in their workplace(s). All violence and harassment prevention controls must be developed in consultation with the respective Joint Health and Safety Advisory Committee and be reviewed and approved by the Workplace Safety Section prior to implementation.

Workplace Threats:

- 13.0 The Corporation asserts that all threats should be taken seriously. This includes any verbal or physical behaviour or other communication that could be reasonably interpreted as conveying intent to cause physical harm to a person, including self, or toward the Corporation's assets, including threats made through electronic means.
- 14.0 Any internal or external person who is knowledgeable about a threat, should respond according to the Corporation's threat assessment procedures, as outlined below.
- 15.0 Threats may not involve imminent danger of physical harm being inflicted. In the event that a threat is made which contains strong emotional content conveying anger toward a person, group or toward the Corporation's assets, but does not communicate intent to cause physical harm, an individual who is aware of the threat should assume the threat could escalate without immediate supportive intervention and de-escalation strategies.
- 16.0 Threats that involve any communication that could be reasonably interpreted as conveying intent to cause physical harm toward a person or toward other Corporate assets. This includes threats made through electronic means. Threats could be communicated through spoken or written words and through various types of electronic mediums. They could also involve the tone, volume and

- cadence of spoken words or the manner and style of written words; body language or the intrusion of personal space; and offensive visuals or sounds.
- 17.0 All threats should be taken seriously and follow the Corporation's Violence and Harassment in the Workplace Procedures, as outlined below.
- 18.0 Threats involving weapons, refer to the Physically Aggressive/Violent Situations section.
- 19.0 All internal and external persons have the inherent right to feel safe at all times. In any situation where physical safety is in danger of being compromised, call for help.
- 20.0 All threats, shall be factually documented according to the Documentation section.

Physically Aggressive/Violent Situations:

- 21.0 The Corporation recognizes that every incident of physical aggression and violence cannot be predicted. Aggression and violence may also not be preceded by any type of threat.
- 22.0 The following priorities shall be invoked in any aggressive and violent situation:
- 22.1 **Keep yourself safe.** Attend to any immediate safety concerns, remember we cannot help others if we are hurt or in danger ourselves. Our employees need to keep themselves as safe as possible so that they are in a better position to help others.
- 22.2 **Assess the situation.** Take a step back and try to remain as calm as possible. Attempt to quickly evaluate the circumstances. Consider the number of people involved, their physical size and the type and number of possible weapons. Keep in mind that many common objects are potential weapons. Determine the immediacy of any dangerous factors involved in this situation. Make a quick determination of severity level.
- 22.3 **Summon assistance.** Summon appropriate assistance to get help on the scene quickly and efficiently. Call for help if you witness an act of workplace violence in progress or if an individual becomes violent and your safety is at risk, leave the area immediately and call 911 or the emergency medical service number in your area.
- 22.4 **Make the environment as safe as possible.** As much as possible, direct onlookers away. Try to remove or reduce accessibility to potential weapons. Isolate the area so nobody wanders into the situation inadvertently. If warranted, practical and safe, evacuate the building or area closest to the incident.

- 23.0 If a weapon is involved in an aggressive incident or if an emergent threat involves actual, potential, or perceived weapons, consider the following examples:
- 23.1 **Avoid reaching for the weapon.** Attempting to disarm a person with a weapon is extremely dangerous.
 - 23.2 **Focus on the individual.** When threatened, we tend to focus on the weapon. Shifting your focus to the individual will remind you that the real danger is not in the weapon itself, but in the aggressor's behaviour.
 - 23.3 **Negotiate.** Communicate simple, clear and reasonable requests in an attempt to solicit affirmative responses (e.g., "May I sit down?" or "Do you mind if I take a deep breath?") The more the aggressor responds affirmatively, the less likely she/he is to engage the weapon.
 - 23.4 **Step back.** Try to negotiate permission to take at least three steps away from the individual. If allowed, the increased distance can reduce both anxiety and weapon accuracy if it is engaged.
 - 23.5 **Buy time.** Time is an asset. The longer you can talk to an aggressive individual, the less likely she/he is to engage the weapon.

Domestic Violence:

- 24.0 The Corporation seeks to provide a respectful, service-oriented and safe workplace at all times and under all circumstances for internal and external customers. We recognize that domestic violence can impact our work directly and indirectly. While staying sensitive to the privacy and confidentiality of personal relationships, we further recognize that there are times when assault, violence and threats of violence may occur related to personal relationships.
- 25.0 The Corporation is committed to heightening awareness of domestic violence and providing guidance for employees and management to address the occurrence of domestic violence and its effects on the workplace. The Corporation intends to publish, maintain and post in locations of high visibility, a list of resources for targets and perpetrators of domestic violence.
- 25.1 All internal and external persons are expected to follow the Corporation's policies, procedures, codes of conduct, applicable law and other expectations related to their behaviour in any work areas or context related to our work. This includes internal or external persons that share a close relationship with an individual employed by the Corporation.
 - 25.2 Assaults, violence and threats, shall be managed according to the Corporation's Violence and Harassment in the Workplace Policy. This includes situations involving an abuser in a past or present actual, perceived or potential close relationship with an employee.

- 25.3 Any individual who obtains legal protection which lists organization locations or contexts as being protected areas must provide to the designated management representative(s) a copy of the official document stating such protection. The Corporation will honour the provisions as specified in the protection documents and offer other types of support and assistance to the employee as warranted by the circumstances.
- 25.4 The Corporation intends to make assistance available to employees involved in domestic violence. This assistance may include: confidential means for coming forward for help, resource and referral information, special considerations at the workplace for employee safety, work schedule adjustments, or leave necessary to obtain medical, counselling, or legal assistance and workplace relocation (if available). In responding to domestic violence, the Corporation will maintain appropriate confidentiality and respect for the rights of the employee involved. If an employee needs to be absent from work due to threats of violence, the length of the absence will be determined by the individual's situation through collaboration with the employee and organization management.
- 25.5 The Corporation will not deny job benefits or other programs to employees based solely on domestic violence related problems. When employees confide that a job performance or conduct problem is related to domestic violence, in addition to appropriate corrective or disciplinary action consistent with company policy and procedure, a referral for appropriate assistance should be made to the employee.

Procedure for Resolving and Investigating Violence & Harassment Complaints:

Documentation

- 26.0 All threats, shall be factually documented according to the procedures outlined in this Policy.
- 27.0 Documenting incidents involving assault, aggression and threats of violence and harassment helps the Corporation monitor ongoing efforts, establish patterns, determine if our violence prevention and response program is as effective as possible and identify any necessary improvement. Incident documentation should be objective, factual, truthful and thorough.
- 28.0 At minimum, incident documentation will include:
- The complainant's name, role and contact information;
 - The name and role of the alleged offender(s);
 - The name and role of involved targets, victims and witnesses;

- Factual details about the incident in chronological order by date and time;
- Description of any actual or perceived weapons seen, threatened or engaged during the incident;
- Description of any physical injuries or damage to personal or Corporation assets.
- Location and context of the incident;
- The names, roles and contact information of witnesses, attaching any written witness statements obtained;
- Type of assistance summoned;
- Final outcome of the incident.

Investigation - Harassment

29.0 Once a formal complaint is made, the Co-ordinator will commence an investigation as quickly as possible.

30.0 Any investigation will include:

30.1 An interview with the complainant and respondent to ascertain all of the facts and circumstances relevant to the complaint, including dates, times and locations;

30.2 Ask the employee (Complainant) to detail, in writing, the nature of the harassment including where, possible places, dates and times;

30.3 Ask the employee for names of witnesses, if any;

30.4 Meet as soon as possible with the person(s) (Respondent) who is alleged to have been the source of the harassment or violence, if that person is an employee of the Corporation. The Respondent will be advised of the complaint and given an opportunity to provide his/her side of the story. This process may take several meetings;

30.5 Ask the Respondent to provide his/her response in writing, along with names of witnesses;

30.6 Determine, in consultation with the Complainant and the Respondent, if an informal resolution of the complaint is possible. This might take the form of a face-to-face meeting, an apology, or some other information resolution.

31.0 If the complaint can be informally resolved, the Corporate Services & Clerks department will retain a copy of the written complaint, together with a memo outlining the resolutions in a separate file.

- 32.0 If an informal resolution is not possible, the Co-ordinator will:
 - 32.1 Interview the witnesses and any other individuals who may have information which might assist in the investigation;
 - 32.2 Meet with the Complainant and the Respondent individually to share the results of the investigation, providing a final opportunity for input from each one before a final decision is reached.
- 33.0 If it is determined that harassment has occurred, the Co-ordinator will:
 - 33.1 Meet with the Respondent's Supervisor/Manager to determine what action is appropriate in the circumstances. This might include counselling, separation of the Complainant from the Respondent, and/or discipline up to and including dismissal.
 - 33.2 The Co-ordinator or Supervisor/Manager will meet with the Complainant to advise them of the nature of the action taken.
- 34.0 If it is determined that no harassment took place:
 - 34.1 The Co-ordinator will so advise the Complainant and the Respondent.
- 35.0 [The Employer will at all times comply with the no reprisal provision contained in Section 50\(1\) of the OHSA.](#)
- 36.0 If the Co-ordinator concludes that the complaint is frivolous, vexatious or made in bad faith, the Coordinator may:
 - 36.1 Consult the matter with another Director, and/or the Complainant's Supervisor/Manager to consider appropriate action.
- 37.0 Management will not disclose the name of a complainant or an alleged harasser or the circumstances of the complaint to anyone except where disclosure is necessary to investigate the complaint or take corrective action and/or required by law.
- 38.0 A record of the complaint together with the results of the investigation will be kept in a separate file in the Human Resources Department.
- 39.0 If it is determined that an unbiased investigation cannot be conducted internally (ie. Complaint against Coordinator or CAO), the Coordinator will contract a third party who is qualified because of knowledge, training and experience, to conduct the investigation.
- 40.0 All information gathered in the investigation process will be documented.
- 41.0 It is the Corporation's goal to complete any investigation within 30 days upon the receipt of the complaint, if possible.

- 42.0 The Complainant and the Respondent, if he or she is a worker of the employer, shall be informed, in writing, of the results of the investigation and of any corrective action that has been taken, or will be taken, as a result of the investigation within ten (10) days, if possible.

Investigation - Violence

- 43.0 When a Supervisor or Manager receives a report of violence they will:

- 43.1 Ensure any persons involved have received appropriate first aid or medical treatment;
- 43.2 Ensure persons are in a safe place;
- 43.3 Call the police, based on the nature of the violence and concerns of the employees or others involved in the situation;

NOTE: Any physical assault in our workplace will be reported to the police. If the Supervisor or Manager is unsure, they should contact the police and the police will then decide whether the incident is a matter for them to handle. If the employees or other parties involved request to have the police notified, the Supervisor or Manager will do so.

- 43.4 Secure the scene;
 - 43.5 Notify Senior Management, the Co-ordinator and any potentially affected employees or others about the situation;
 - 43.6 Begin the investigation process immediately.
- 44.0 Members of the investigation team will be made up of competent persons who can be impartial and have knowledge, training and experience regarding workplace violence issues and understand relevant legislation. The team will include the Co-ordinator and may also include Senior Management, other Supervisors/Managers, and a designated safety committee member or safety representative. These team members must maintain confidentiality throughout the process. The identities of the people involved will not be disclosed outside the team, unless the disclosure is necessary for the purposes of the investigation or as required by law.
- 45.0 In completing the investigation they will:
- 45.1 Sensitively interview the victim(s);
 - 45.2 Take witness names, contact information and statements;
 - 45.3 Attempt to address and resolve the complaint between the parties involved;

- 45.4 Take special considerations for privacy and sensitivity for the victim in the situation;
- 45.5 Determine actions required to prevent re-occurrences and implement controls;
- 45.6 Record all information on the Violent Incident Reporting Form;
- 45.7 Meet with the victim and perpetrator to disclose the results of the investigation.
- 45.8 Make changes to the Hazard Assessment and this procedure, as needed.
- 45.9 Only communicate changes to the Hazard Assessment and this procedure through the Safety Committee minutes. All other information collected through the investigation is considered confidential.

Confidentiality, Complaints and Investigations

- 46.0 All documentation related to complaints made under this Policy shall be filed in one centralized location, separate from any personnel files, with the Workplace Co-ordinator, to ensure confidentiality.
- 47.0 The Corporation recognizes the sensitive nature of harassment, discrimination and violence and will take measures to keep all complaints confidential, unless it is necessary for the investigation or required by law.
- 48.0 Records will be destroyed in accordance with the record retention requirements of the Corporation's Record Retention By-Law and the Municipal Freedom of Information and Protection of Privacy Act.

Post Incident Follow-Up:

- 49.0 Post-incident response and evaluation are vital elements of the Corporation's violence and prevention response program. This process contains four distinct phases:
 - 49.1 **Assessment** – During the assessment phase, management will work with response agencies and support services to evaluate human welfare and decide if there are immediate medical needs. We will also consider the emotional welfare of internal and external persons and arrange relevant professional services and support as warranted by the situation.
 - 49.2 **Documentation** – For many reasons, factual incident documentation is a vital phase of the Corporation's post-incident response plan. Documentation provides a detailed account of an incident so that appropriate follow-up action can be taken, patterns and trends can be identified, policies and procedure can be assessed and steps can be

implemented to improve the safety of everyone in our work setting. Please see the “Documentation section” regarding documentation requirements. Documentation will take place as soon as possible and reasonable following an incident and should be submitted per policies, procedures and time frames identified in the “Documentation section”.

- 49.3 **Debriefing** – During a crisis situation, involved employees face many decisions that must be made in a matter of seconds. Post-incident debriefing will take place as soon as possible and practical once the immediate incident concludes and involved parties have regained some sense of physical and emotional control. Depending on the nature and severity of the incident, this may include a specific meeting to review the situation or it may be less formal. It will focus on objective review of the factual basis of the incident with as many involved employees as possible. Employees may wish to make recommendations on changes to work environment or context. It is important for employees to express trust and confidence in one another and acknowledge efforts in coping with unusual and stressful circumstances.
- 49.4 **Identification of further needs** - During or soon after employee debriefing, the Corporation will provide information and resources to all employees relative to incident follow up and resources. This may include the Corporation's plans for further action and identification of resources for employees in obtaining additional support and assistance. The Corporation will also consider employee needs in engaging further professional debriefing services through properly qualified professionals.

Training:

- 50.0 The Corporation asserts that a comprehensive employee training program is essential to preventing and responding to any type of assault, aggression and threat of violence under the definitions adopted. This will be foremost and ongoing training for all employees at all levels.
- 51.0 The Corporation will work with properly qualified and credentialed training consultants, organizations and professionals in assessing training needs related to our specific work environment and any associated locations and contexts.
- 52.0 Specific training components will include but not be limited to:
- 52.1 Employee rights, expectations and responsibilities under the Corporation's policies and procedures.
- 52.2 Employer responsibilities to internal and external customers under the Corporation's policies and procedures.
- 52.3 Any related Corporation policies and procedures, applicable requirements under the laws in specific jurisdictions, other regulations, standards, best

practices, or mandates regarding assault, aggression and threats of violence.

- 52.4 Training will be relevant to the range of behaviours occurring along a workplace violence continuum that, due to their nature and severity, significantly affect any Corporation asset; generate a concern for physical or emotional safety or both; or result in significant emotional or psychological trauma, physical injury or death.
- 52.5 Specific training topics for all employees shall include but not be limited to:
- i) Information, skills and practice in safe, respectful and service-oriented behaviours applicable to everyday workplace situations;
 - ii) Behaviour escalation levels and early warning signs;
 - iii) Verbal and nonverbal de-escalation strategies;
 - iv) The role of personal space and body language during crisis moments;
 - v) The use of tone, volume and rate of speech during crisis moments;
 - vi) Effective listening skills;
 - vii) Specific human factors that influence our behaviour during crisis moments.
 - viii) Specific staff debriefing strategies.
- 52.6 Refresher training will be required for all staff and will incorporate earlier response strategies and protocols while also furthering and advancing staff skills in related topic areas. These may include specific training relative to other behaviours from the workplace violence continuum such as discourtesy and disrespect, intimidation, harassment, retaliation, assault and physical aggression.
- 52.7 Specialized training strategies will be provided relative to specific employee roles during a crisis where specifically authorized by Corporation policies and procedures and any applicable laws, industry and professional standards, licensing or accreditation processes or other regulations, standards, best practices or mandates specifically related to specialized staff roles. These topics and skills may include:
- i) Safe and non-harmful evasion and escape strategies generally applicable to a wide variety of physically aggressive behaviours;

- ii) Safe and non-harmful physical intervention strategies that may be implemented by specifically designated employees during physically violent emergencies.

Evaluation:

- 53.0 In accordance with of the OHSA, this policy shall be reviewed (in consultation with the JHSC) as often as necessary, but at least annually, and the Policy shall be posted at an inconspicuous place in the workplace.