

# Benefit Plan Administrators' Workplace Violence Policy

Statement of Policy and Procedure

6/15/2010

Benefit Plan Administrators

# WORKPLACE VIOLENCE POLICY

## **1. Policy**

### 1.01

Benefit Plan Administrators (BPA) does not tolerate violence or unacceptable behaviour in the workplace perpetrated by or against employees, customers, clients or other third parties. In the event of a violent incident or unacceptable behaviour perpetrated by an employee, BPA will act to severely discipline the employee, up to and including discharge for cause.

### 1.02

BPA shall establish programs and procedures to assess and reduce the risk of violence and unacceptable behaviour in the workplace. All employees are expected to be aware of and participate in such programs and procedures, as required.

### 1.03

A copy of this policy shall be provided to each new employee as part of the employee's hiring documentation. Additionally, this policy shall be posted and remain posted on all workplace bulletin boards.

### 1.04

This policy shall be reviewed after any serious incident or at least annually, whichever is the earliest.

## **2. Purpose**

### 2.01

The purpose of this policy is to establish procedures to minimize and/or prevent violence and unacceptable behaviour in the workplace and to foster the safety and security of BPA's employees, customers and visitors to our work sites.

### **3. Scope**

#### 3.01

This policy applies to all employees of and visitors to BPA.

### **4. Responsibility**

#### 4.01

##### *Employees*

- a) Employees are responsible for informing their Managers of any violence, potential risk of violence, or unacceptable behaviour they may experience or witness. This includes issues in the employee's non-work life that may impact on the employee's or his or her co-worker's safety.
- b) Employees are responsible for reporting to their Managers any incidents of violence or close calls, according to the procedures set out in this Policy.
- c) Employees are responsible for attending any training or information sessions provided by the employer to reduce violence or risks of violence.
- d) Employees are expected to co-operate with the police, company investigators or other authorities as required during any investigation related to workplace violence.

#### 4.02

##### *Managers*

- a) Managers are responsible for assessing the risk of violence to employees in their jurisdiction, minimizing those risks where necessary or reasonably possible and informing any affected employee of such risk or potential risk.
- b) Managers are responsible for ensuring employees are trained to:
  - i. Recognize the potential for violence
  - ii. Follow the procedures and policies developed to minimize risk
  - iii. Respond to incidents appropriately; and
  - iv. Report and document such incidents.
- c) Managers are responsible for tracking and reporting risks of violence, incidents of violence, and close calls to Senior Management and the Joint Health and Safety Committee, according to the time lines set out in the procedures. The Violent Incident Report Form shown in this policy is used for this purpose.
- d) Managers are responsible for ensuring proper medical care is provided for anyone involved in an incident and for securing the safety of employees, before investigating the incident or taking reports.

- e) Managers are responsible for co-operating with police, company investigators or other authorities, as required during any investigation related to workplace violence.

## **5. Definitions**

### 5.01

“BPA” and “Company” means any of the following BPA Financial Group companies: Benefit Plan Administrators Limited, Benefit Plan Administrators (Atlantic) Limited and BPA Consulting Group Limited.

### 5.02

“Violence” means unacceptable behaviour as defined in paragraph 5.03 and includes any incident in which there is:

- a) The exercise of physical force by a person against an employee, in the workplace, that causes or could cause physical injury to the employee.
- b) An attempt to exercise physical force against an employee, in a workplace, that could cause physical injury to the employee
- c) A statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee, in a workplace, that could cause physical injury to the employee
- d) An attempt to threaten or assault a client or visitor to the workplace while on company premises; or
- e) An attempt by an employee to threaten or assault a client, co-worker or other individual in circumstances relating to the employee’s execution of his or her duties, whether on or off company premises.

### 5.03

“Workplace” means any place where business or work-related activities are conducted. It includes, but is not limited to, the physical work premises, work-related social functions, work assignments outside BPA’s offices, work-related travel, and work-related conferences or training sessions.

### 5.04

“Unacceptable Behaviour” means physically or psychologically aggressive behaviours including but not limited to:

- Hitting, kicking, punching, pushing, shoving, slapping, pinching, grabbing, biting
- Carrying or brandishing weapons of any sort
- Throwing objects at an individual with a view to cause physical injury or fear

- Destruction of workplace or co-workers' property
- Threats of violence
- Intimidating behaviour that causes the recipient to have a fear of physical violence
- Obscene or harassing telephone calls.

#### 5.05

“*Close Calls*” means incidents which did not result in actual physical harm, but except for circumstance, had the potential to result in physical harm.

#### 5.06

“*Minor Incident*” means an incident in which someone was physically harmed (whether requiring medical attention or not), or which continued or escalated after Managerial mediation.

### **6. Procedure**

#### 6.01

The Manager of each Department shall initiate a process to involve Managers, employees and the Joint Health and Safety Committee in assessing the risk of violence in the department and work environment on a periodic basis. The process shall include taking actions to remove as many risks as can be reasonably removed and instructing employees to recognize risk. The risk assessment shall be reviewed at least annually.

#### 6.02

Each and every incident of violence in the workplace shall be reported immediately to the Manager. The Manager shall investigate the incident immediately.

#### 6.03

- a) The Manager shall immediately make the appropriate inquiries of the victim and/or witnesses to determine if the incident is minor or serious.
- b) If the incident is minor:
  - i. The Manager will determine if mediation is appropriate and if so, mediate or arrange for mediation of the situation;
  - ii. Conduct the appropriate investigation immediately; and
  - iii. Within twenty-four (24) hours, write a report outlining the details, facts and witnesses of the incident and submit the report to Senior Management and the Joint Health and Safety Committee.

- c) If the incident is serious:
- i. The Manager will take such actions as deemed appropriate for the circumstance. Actions may include, sounding alarm, alerting building security, contacting the police.
  - ii. Conduct the appropriate investigation immediately; and
  - iii. Within twenty-four (24) hours, write a report outlining the details, facts and witnesses of the incident and submit the report to Senior Management and the Joint Health and Safety Committee.

If the assailant is an employee, the Manager shall apply the appropriate disciplinary measures based on the facts of the incident and the assailant's employment record.