

Key Policies Package

2.4.3 HIGH RISK SUPERVISION

1. High risk supervision is the very close observation of clients who are believed to be at risk of injury to themselves or others.

2. The following guidelines must always be observed when supervising a high-risk client:
 - DO NOT LET THE CLIENT OUT OF YOUR SIGHT, even for a minute, unless your personal safety is in jeopardy;
 - Ensure all windows and exits are secure;
 - If the client is confined to the bedroom, remain outside the bedroom with the door open so you can observe the client;
 - Explain your expectations to the client in a clear, calm, but firm way. Do not argue with the client;
 - Store the client's shoes and coat where he/she cannot easily access them;
 - If the client needs to use the washroom, inspect it first for dangerous objects such as razor blades, rat-tailed combs and drugs. All potentially dangerous items must be removed before the client uses the washroom;
 - If the washroom has a window that can be opened, keep the door slightly opened so you can hear if the client tries to get out;
 - Set a short time limit for a washroom visit;
 - Employees are to stay awake and alert throughout their entire shift.

3. Any unexpected incidences that occur during high-risk supervision must be reported to the supervisor immediately and documented in detail on a contact note or an Incident Form (CI or GI).

2.4.5 USE OF STAFF VEHICLES

The following is to apply:

1. Employees are discouraged from using their personal vehicles in their work duties. This may be allowed under the following circumstances:
 - employees must have a valid driver's license;
 - employees must have a minimum of two million dollars automobile liability insurance. A copy of the actual current insurance is on the employee's file
 - the vehicle must be in good mechanical condition;
 - the vehicle must be driven safely, obeying all laws;
 - road/weather conditions are not considered to be a hazard i.e. absence of blizzard conditions, heavy snowfall/rainfall, fog, etc.;
 - seat belts and other restraint devices must be used by all occupants of the vehicle;
 - the client will ride in the back seat, passenger side. This is not a client/guardian choice. If a client's circumstance is such that riding in the back seat poses a hazard to their health/well-being, an "Agreement To Transport A Client In The Front Seat Of A Staff Driven Vehicle" form must be completed and approved by the appropriate Manager. This form must be reviewed annually.
 - infants or children less than 40 lbs. are not to be transported by employees.

2. Employees using privately owned vehicles for business use, approved in advance, will be paid mileage or a monthly stipend according to current Independent Counselling Enterprises practice.

3. A client will never be left alone in a vehicle for any reason.

4. Road and weather conditions should be considered prior to any outing keeping in mind client and employee safety and security. The employee is not to drive if the weather is unacceptable.
5. Employees using their vehicles must have an approved First Aid kit in their vehicles at all times.
6. Employees are not to drive client friends/family members. The employee will only pick up guardians under minimum conditions i.e. meetings.

Transporting Clients with Behavioural Issues:

1. An employee should not take a client in their vehicle if at any time the employee deems it would be unsafe for the client or themselves. It is imperative a review be conducted prior to any further transportation in private vehicles. Protocols can be developed to ensure safe transportation for both client(s) and employee. This may mean limiting a client to public transportation with or without an escort. Taking public transportation, walking, or staying home are options with many clients, as appropriate.
2. Mandatory Auto Insurance is required as per **Policy 3.1.6 Mandatory Auto Insurance Coverage**
3. If any of the following conditions apply, permission must be obtained from the Community Support Coordinator/Community Team Coordinator. If the trip is to continue, extra precautions will be taken as instructed:
 - The client has any history of aggression while riding in a vehicle;
 - The client is not familiar with riding in a vehicle or can become easily agitated;
 - The client has been showing signs of escalation or aggression in the 3 hours previous to the planned trip;
 - The client is not agreeable to the planned trip.

4. In all cases, the following will occur:

- The employee will be aware of the client's potential behaviours and how to deal with them;
- The client must sit in the back seat, passenger side;
- Any loose objects (ex. snowbrushes, tools, clothes) will be stored out of reach of the client;
- The client will have their seat belt fastened at all times.

5. If a client shows any signs of aggression or escalation while in a moving vehicle:

- The employee will pull off the road as soon as it is safe to do so;
- The employee will attempt to de-escalate the client and/or obtain assistance as appropriate by using available assistance, calling 911 or the I.C.E. office or ECAT if after hours.

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2.5.2 UNANTICIPATED SITUATIONS OR BEHAVIOURS OF CONCERN

I.C.E. is committed to ensuring the health and safety of its employees, clients, and the community. In the event of an unanticipated situation or behaviour of concern the I.C.E. employee will respond in the least intrusive manner, ensuring the health and safety of themselves, the clients, and others in the area.

An unanticipated behaviour or situation of concern occurs when a client:

- Places his/her self or others at risk of immediate physical harm (e.g. unexpectedly runs into the street, approaches an aggressive dog etc.);
- Engages in significantly inappropriate, socially unacceptable, or illegal behaviours that may jeopardize their ability to safely participate in the community (e.g. attempts theft, public disrobing etc.);
- Engages in actions that could cause significant property damage (e.g. fire starting, kicking/striking vehicles etc.).

Employees will use the least intrusive intervention necessary to resolve the unanticipated/emergency situation. Refer to **Appendix A. Continuum of Positive Behaviour Supports**. The continuum lists interventions in ascending order based on the intrusive nature of the procedure

Positive Approaches: Is the best approach or intervention for the client during an unanticipated situation and/or behaviour of concern to produce superior outcomes that do not restrict the client.

Examples:

- Making a simple, one time change to the environment (e.g. changing the seating arrangement in a room);
- Modeling or using informal practices that promote positive interactions (e.g. identifying and matching individuals who have complimentary interests or skills);
- Provide calm, clear, and consistent verbal direction (e.g. “Please wait on the sidewalk for the green light and “Walk sign” so you stay safe.);
- Provide the client with choices/options;

- Set boundaries (e.g. “That is private property and we don’t have the right to go there.”);
- Maintain a safe physical distance/environment (e.g. allowing the client space, keeping others at a safe distance);
- Use of verbal repetition, calming gestures, and a non-confrontational approach to diffuse the situation.

If a situation cannot be safely resolved using **Positive Approaches** staff may need to proceed to the use of **Restrictive Approaches**.

Restrictive Approaches: The least intrusive unplanned response to a client who is engaging in an unanticipated situation and/or behaviour of concern. This is an immediate intervention to ensure the safety of the individual or others, or to prevent significant property damage.

Examples:

- Use of blocking and stance to protect them from external threats (e.g. moving vehicles, aggressive animals, or to stop a client running into the street);
- Employees will call 911 for police support when:
 - There are weapons involved;
 - There is an imminent risk of physical assault / danger towards self, others in the community and /or the client.

In the event of an occurrence of and unanticipated situation or behaviour or concern:

- The employee must report the incident to their supervisor/ ECAT immediately;
- The employee will complete a Critical / General Incident Report and forward it to their supervisor immediately or within 24 hours;
- The supervisor will ensure that follow up is completed as per **Policy 2.7. 3 Critical and General Incidents** and will:
 - Contact stakeholders as required (e.g. guardian, funding source etc.);
 - Problem solve with the client to develop strategies for the future;
 - Complete a de-briefing with all involved as required;

- Forward Critical / General Incidents to the Restrictive Procedures Advisory Committee for review and follow up.

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3.5.2 WORKER RIGHT TO REFUSE DANGEROUS WORK AND ASSIGNMENT OF HEALTH AND SAFETY RESPONSIBILITIES

A. Workers have the following rights:

1. Right to know
2. Right to participate
3. Right to refuse dangerous work

A worker may refuse to work or to do particular work at a work site if the worker believes on reasonable grounds that there is a dangerous condition at the work site or that the work constitutes a danger to the worker's health and safety or to the health and safety of another worker or another person. Workers are required to protect themselves and others at or in the vicinity of the work site.

B. Refusal procedure:

1. The worker will promptly report the refusal and the reasons for the refusal to the supervisor or I.C.E. designate.
2. If possible, the supervisor or I.C.E. designate will remedy the issue immediately. If the supervisor/designate does not remedy the dangerous condition immediately, the supervisor/designate shall immediately inspect the dangerous condition in the presence of the worker, when it is reasonably practicable to do so and when the presence of the worker does not create a danger to the health and safety of that worker or of any other person, and one of the following persons, when it is reasonably practicable to do so and when the presence of that person does not create a danger to the health and safety of that person or of any other person:
 - a. a joint work site health and safety committee co-chair or a committee member who represents workers; or
 - b. if there is no committee or representative, or where no committee member or representative is available, another worker selected by the worker refusing to do the work.
3. The supervisor/designate shall take any action necessary to remedy any dangerous condition, or ensure that such action is taken.
4. Until the dangerous condition is remedied, the worker who reported it may continue to refuse to work or to do particular work to which the dangerous condition may relate.
5. When a worker has refused to work or to do particular work, the supervisor/designate

shall not request or assign another worker to do the work until the supervisor/designate has determined that the work does not constitute a danger to the health and safety of any person or that a dangerous condition does not exist.

6. Where the supervisor/designate assigns another worker to do the work, the supervisor/designate shall advise that worker, in writing, of
 - a. the first worker's refusal,
 - b. the reasons for the refusal,
 - c. the reason why, in the opinion of the supervisor/designate, the work does not constitute a danger to the health and safety of any person or that a dangerous condition is not present, and
 - d. that worker's right to refuse to do dangerous work.
7. On completing an inspection the supervisor/designate shall prepare a written report of the refusal to work, the inspection and action taken, if any.
8. The supervisor/designate shall give a copy of the report to the worker who refused work and the joint work site health and safety committee.
9. The supervisor/designate shall ensure that the report does not contain any personal information related to the worker who refused to work.
10. If no resolution can be reached the situation can be referred to an OHS office to resolve the matter.

Protection of Workers

Workers are protected from discriminatory action based on the refusal to perform dangerous work; this includes action or threat of:

1. Disciplinary action such as suspension or termination
2. Demotion
3. Transfer
4. Wage reduction
5. Change in hours

C. Assignment of Health and Safety Responsibilities

The Employee/SHO has the responsibility to:	
<ul style="list-style-type: none"> • Ensure the health and safety of themselves and others. • Refuse work that the employee / SHO feels is a threat to his / her health and safety. This will be without penalty to the employee. • Report unsafe or unhealthy conditions or any known workplace hazard to the employer / supervisor. • Work in compliance with the agency's health and safety regulations and cooperate with their employer/ supervisor for the purposes of health and safety. • Know their responsibilities and duties under legislation and comply with requirements. • To report all workplace injuries immediately to the employer or supervisor and to not place themselves in danger. In the event of an injury, the employee will follow all agency policies and procedures. 	<ul style="list-style-type: none"> • Keep their supervisor informed and supply medical documentation, as appropriate, to support any restrictions or limitations to the work the employee can safely complete. • Report any known equipment or protective device that may be dangerous, missing or defective to the employer / supervisor. • Practice Standard Precautions. • Use all devices and wear all personal protective equipment (PPE) as directed. • Not use or operate any equipment in a way that may endanger any worker or others present in the vicinity of the worksite. • Not remove or disable any protective device. • Not engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct. • Refrain from causing or participating in violence and harassment.

The Supervisor has the responsibility to ensure:	
<ul style="list-style-type: none"> • That they are competent and protect the health and safety of employees and others on the work site. • That the supervisor and employees under their supervision work in accordance with I.C.E. policy and procedure and applicable health and safety legislation. • All health and safety concerns are reported to the employer. • That the employee properly uses or wears any equipment, protective devices or clothing that is required by the agency. • That the employee practices Standard Precautions. • To ensure employees under their supervision are not subjected to or participate in violence or harassment at the worksite. 	<ul style="list-style-type: none"> • Workers are advised of all health and safety hazards. • Every reasonable precaution has been taken to protect the health and safety of workers. • To respond in a timely and effective manner to employees that decide the skill requirements for service provision exceed what they are able to safely do. • The employee is advised of any known or foreseeable safety and health hazards in the area where the employee works. • To advise workers of all health and safety hazards ensure the employee has the appropriate medical / behavioural training prior to working a shift. • To report any known workplace hazard to their employer. • Provision of written instructions when required, including measures and procedures to be taken for the employee's protection and control of hazards.

The Employer has the responsibility to ensure:	
<ul style="list-style-type: none"> • Health and Safety leadership is visible and demonstrated through organizational health and safety standards, goals and objectives. • The health, safety, and welfare of workers and other persons at the work site. • Basic rights of workers including their right to refuse dangerous work, that they are protected from reprisal for exercising their right to refuse, and the employee has the right to participate in health and safety discussion or on the health and safety committee. • Employees are aware of their rights and duties under legislation and are aware of any health and safety issues. • Written health and safety policies are in place, available to employees and compliant with applicable legislation. ICE completes a formal policy review every three years. • Workers are not subjected to or participate in harassment or violence. • Establishment of a joint work site Health and Safety Committee. • Workers must be adequately trained in all matters necessary to protect their health and safety including; training in work practices/procedures, how to safely use equipment, and how to select and use PPE. • Those providing direction or supervision are competent. 	<ul style="list-style-type: none"> • Regular inspections of worksites including equipment, materials and protective devices and completion of corrective actions as required. • Hazard identification, assessment and documentation is completed for existing and potential hazards and updated ongoing. Methods are provided to control or eliminate hazards identified. • Employees are involved in workplace hazard identification and assessment and in the control or elimination of hazards identified. • Incidents are reported, investigated and followed up with corrective actions as required. • Effective claims management in the event of an employee injury. • Consultation and cooperation with the joint Health and Safety Committee and the resolution of issues in a timely manner i.e. 30 days. • Public safety at or in the vicinity of the work sites.

The Visitor/Contractor has the responsibility to:	
<ul style="list-style-type: none"> • Comply with all applicable I.C.E. Policies and Procedures, especially those pertaining to health and safety and OHS legislation. • To work safely and do nothing that increases the normal hazards to any persons at the worksite. (See Policy 3.5.8 Visitors / Contractors). 	<ul style="list-style-type: none"> • Inform I.C.E. of any hazards arising out of their activities at the worksite and/or any uncontrolled hazard observed.

3.5.12 FIRE SAFETY

Safety standards are regulated internally by I.C.E.'s policies and procedures and various audits and inspections. Legislation - municipal zoning bylaws, Alberta Public Health Act, Alberta Safety Codes Act for building/ fire codes and industry standards mandates compliance to safety regulations by conducting inspections.

Residential and Support Home Programs:

Independent Counselling has procedures in place and a documentation system to verify procedures and specific equipment that must be present in dwellings to support the safety of clients in residential (1010 programs) and support homes (1020 programs). The table below will clearly indicate what is required in each program as there are differences.

Equipment	Residential Setting	Support Home
Windows in client bedroom	<p>Requirement: Must meet Minimum housing standards and approved prior to the client moving into the home. Measurements are redone and new approval required if construction takes place in the home, the client moves to a different bedroom or client moves to a new dwelling.</p> <p>Documentation: Residential window egress and handrails/guardrails as per minimum housing and health standards form. All contact with the landlord in regards to these standards must be supported by written documentation.</p>	<p>Requirement: Must meet minimum housing standards and approved prior to the client moving into the home and annually thereafter. Measurements are also redone and new approval required if construction takes place in the home, the client moves to a different bedroom or client moves to a new dwelling. Note window measurements must also be done in respite home and wherever respite worker sleeps in the support operator's home.(if respite sleeps over)</p> <p>Documentation: Support Home Window Egress, and Handrails/guardrails as per</p>

		minimum housing and health standards form and initial/annual checklist.
Floor plan and emergency evacuation procedures	<p>Requirements: Floor plans and emergency evacuation procedures are posted on each level of the home or apartment and must be posted the day clients move into the home.</p> <p>For apartments the evacuation procedure will be that which the building has posted.</p> <p>Documentation: Postings required. Validated on monthly safety inspections, random inspections and EQAs.</p>	<p>Requirement: The operator is aware of emergency evacuation procedures.</p> <p>Documentation: Floor plans and emergency evacuation procedures are provided to the office. No postings are required in the home. Validated on initial/annual checklist, monthly checklist, monthly safety checklist and Support home EQAs.</p>
Fire safety plans	<p>Requirements: Fire safety plans are posted on each level of the home or apartment and must be posted the day clients move into the home.</p> <p>Documentation: Postings required. Validated on monthly safety inspections, random inspections and EQAs.</p>	Not applicable
Smoke detectors in common area	<p>Requirements: Smoke detector on each level of the home. Must be hard wired and all interconnected.</p> <p>Documentation: Validated on monthly safety inspections, random inspections and EQAs.</p>	<p>Requirements: Working smoke detectors on each level of the dwelling.</p> <p>Documentation: Validated on initial/annual checklist, monthly checklist, monthly safety checklist and Support home EQAs.</p>
Smoke detectors in all sleeping areas – client bedrooms and sleep night staff accommodations	<p>Requirements: One working smoke detector within 4 inches of the ceiling or on the ceiling. All smoke detectors must be interconnected. Batteries changed in March and October when clocks change.</p> <p>Documentation: Validated on monthly safety inspections, random inspections</p>	<p>Requirements: One working smoke detector per client bedroom.</p> <p>Documentation: Validated on initial/annual checklist, monthly checklist, monthly safety checklist and Support home EQAs.</p>

	and EQAs.	
Carbon monoxide detectors	<p>Requirements: One working CO detector on each level of the dwelling.</p> <p>Documentation: Validated on monthly safety inspections, random inspections and EQAs.</p>	<p>Requirements: Minimum of one working CO detector in the dwelling.</p> <p>Documentation: Validated on initial/annual checklist, monthly checklist, monthly safety checklist and Support home EQAs</p>
Fire Extinguishers	<p>Requirements: One 5 lb. extinguisher, wall mounted, on every level of the home. Must be fully charged and the seal is on. Dial reads in the green zone. Inspection card initialed monthly. Must be inspected by a certified fire extinguisher inspector within the last 12 months.</p> <p>Documentation: Validated on monthly safety inspections, random inspections and EQAs. Monthly inspection card signed as well as evidence inspected by inspector.</p>	<p>Requirements: One 5 lb. extinguisher, wall mounted, on every level of the home. Must be fully charged and the seal is on. Dial reads in the green zone.</p> <p>Documentation: Validated on initial/annual checklist, monthly checklist, monthly safety checklist and Support home EQAs</p>
Fire evacuation equipment e.g. Ladder , fire blanket	<p>Requirement: Equipment dependent on location of evacuation site and client’s ability. Equipment present, functional and in appropriate location.</p> <p>Documentation: Validated on monthly safety inspections and EQAs.</p>	<p>Requirement: Equipment dependent on location of evacuation site and client’s ability. Equipment present, functional and in appropriate location.</p> <p>Documentation: Validated on initial/annual checklist, monthly checklist, monthly safety checklist and Support home EQAs</p>
Emergency first aid supplies	<p>Requirement: Number 1 Kit see policy 3.5.6 for contents with regular inventory conducted.</p> <p>Documentation: Validated on monthly</p>	<p>Requirement: First aid supplies available and must be a minimum of what is in a type P kit.</p> <p>Documentation: Validated on</p>

	safety inspections and EQAs.	initial/annual checklist, monthly safety inspections and EQAs.
Emergency preparedness kit	<p>Requirement: Must have an emergency preparedness kit with specified contents as per policy. Kit contents are clearly indicated on cover and checked monthly.</p> <p>Documentation: Validated on Emergency kit contents form, monthly safety inspections and EQAs.</p>	<p>Requirement: Emergency kit/ supplies are available as per suggested supply list.</p> <p>Documentation: Validated on monthly safety inspections and EQAs.</p>
Safe house and emergency number	<p>Requirement: Emergency phone numbers and safe house information clearly posted and easily accessible.</p> <p>Documentation: Validated on monthly safety inspections and EQAs.</p>	<p>Requirement: Emergency phone numbers and safe house information clearly posted and easily accessible.</p> <p>Documentation: Validated on monthly safety checklist and support home EQA</p>
Flash lights	<p>Requirement: Flashlights on each level of the home.</p> <p>Documentation: Validated on monthly safety inspections and EQAs.</p>	<p>Requirement: Flashlights available on each level of the home.</p> <p>Documentation: Validated on monthly safety checklist and support home EQA</p>
<p>Inspections/Procedures: It is to be noted that inspection type and specifications for each inspection are not only dependent on service type but also the dwelling classification and the client's ability to self- evacuate in an emergency. It is this agency's preference to have apartments/condos as rental dwellings.</p>		
Fire Prevention Inspection Completed by external resource. Type: External Inspection	<p>Requirement: Fire safety inspection is conducted by a fire inspector. A report is provided to I.C.E. validating compliance. Frequency of inspections as per the inspector's timelines. Inspection specifications are dependent on dwelling type and client ability.</p>	Not applicable
Public Health Inspection Type: External Inspection	<p>Requirement: An inspection is completed as per Public Health's timelines and a report is provided clearly</p>	Not applicable

	indicating agency is compliant. An inspection may also be conducted if a complaint reported to this agency about a particular site.	
I.C.E. may contract with external resources for inspections to facilitate compliance to building/safety codes as per legislation	Requirements: As per legislation and as scheduled by I.C.E. The agency will provide a written report to I.C.E.	Not applicable
Monthly safety inspection completed by I.C.E.	Requirement: Completed monthly and provided to the supervisor of the program.	Not applicable
Monthly safety Checklist completed by the support home operator	Not applicable	The operator is to complete a monthly safety checklist and provide a copy to the program supervisor.
Fire drills completed by I.C.E. employees, support home operator and clients.	Requirement: Minimum of once per month all regular/signed staff working in the program must participate in rotational fire evacuation drills with the client(s). For any client in a basement bedroom there must be monthly recorded fire drills at least 3 times a year (January, May and September) where the client is required to evacuate from their bedroom window. A minimum of 2 of these fire drills must be observed by the Program Manager /Regional Manager. The appropriate equipment (sturdy, functional) necessary to facilitate safe evacuation must be present and in good working condition. The equipment must be stored to allow easy access (bedroom) in an emergency. Should the physical capabilities of a client change the agency will ensure that they are still able to	Requirement: Minimum of once per month. For any client in a basement bedroom -There must be monthly recorded fire drills at least 3 times a year (January, May and September) where the client is required to evacuate from their bedroom window. A minimum of 2 of these fire drills must be observed by the Program Manager /Regional Manager. The appropriate equipment (sturdy, functional) necessary to facilitate safe evacuation must be present and in good working condition. The equipment must be stored to allow easy access (bedroom) in an emergency. Should the physical capabilities of a client change the agency will ensure

	perform this function. Documentation: The drill is documented on the fire/evacuation drill report and attached to the monthly safety inspection checklist	that they are still able to perform this function. Documentation: The drill is documented on the fire/evacuation drill report and attached to the monthly safety checklist.
Emergency evacuation drills	Requirement: Will be conducted a minimum of 3 times per year. Documentation: The drill is documented on the fire/evacuation drill report and attached to the monthly safety inspection checklist.	Not applicable
Internal Audits –Random Inspections and/or EQAs	Requirement: Random inspections– Minimum of 3 times per year. EQAs- 2 times per year. Documentation: Findings are documented on Random inspection forms and EQA form for residential settings.	Requirement: EQAs are completed once per year. Documentation: Findings are documented on EQA forms for support homes.

Note: Any form listed above is located in the Master document binder in the appropriate section.

Office Settings

Office settings will have the following:

- Postings of the overall layout of the site with all possible exits from the site clearly marked.
- Emergency evacuation procedures posted.
- Wall mounted 5 lb. fire extinguishers. Extinguishers are fully charged, seal is on and dial reads in the green zone. Must be inspected by a certified fire extinguisher inspector within the last 12 months. Extinguisher inspection card initialed monthly.
- Available first aid kit as per legislation.
- Working flashlights.

- Regular fire drills.
- Regular emergency evacuation drills.
- Internal office inspections for safety.

All employees are responsible to familiarize themselves with the fire evacuation procedure upon arrival during their first shift worked at each site.

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3.6.4 WORKPLACE VIOLENCE AND BULLYING/HARASSMENT

The management of Independent Counseling Enterprises is committed to providing a work environment in which all workers are treated with respect and dignity. I.C.E. is ultimately responsible for worker health and safety and will take whatever steps are reasonable to protect our workers from the potential hazards associated with workplace violence, bullying and harassment. Violent behaviour, threats of violence, and bullying/ harassment is unacceptable and will not be tolerated from any person at or outside of the work site including supervisors, workers, contractors, clients, and members of the public.

I.C.E., as the employer, is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence and bullying/harassment. Everyone is obligated to uphold this policy and to work together to prevent workplace violence and bullying/harassment.

Violence, whether at a work site or work-related, is the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence. Domestic violence is any abusive, violent, coercive, forceful, or threatening act or word by a family member or household member toward another.

Workplace **bullying and harassment** means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows, or ought reasonably to know, will or would cause offence or humiliation to a worker, or adversely affects the worker's health and safety. It includes conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and a sexual solicitation or advance.

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or a work site is not workplace bullying or harassment.

In support of this policy, I.C.E. has put in place workplace violence and bullying/harassment prevention procedures. It includes measures and procedures to protect workers from the hazard of violence and bullying/harassment and a process for workers to report incidents, or raise concerns.

A. Prevention measures/procedures:

1. Hazard assessment and control forms for each position are reviewed in consideration of the hazard of workplace violence, harassment/bullying. I.C.E. conducts risk assessments and inspections of work sites to minimize the hazard of workplace violence, bullying/harassment through use of the following processes/documents: EQA, Random Inspection, Hazard Assessment and Control Document Master, Critical/General Incident Reports and Non-residential Staff Communication Document.

2. When hazards are identified, controls to prevent workplace violence, bullying/harassment are used and communicated to staff; safe work procedures are based on hazard assessment and controls for each job/position as it relates to workplace violence, bullying/harassment. Environmental and client specific workplace violence, bullying/harassment hazards are documented on each Hazard Assessment and Control Document and Risk Assessment; workers are informed of hazards prior to working at that site and/or with that client.
3. Reasonable precautions are taken to protect workers at the work site from incidents of domestic violence.
4. Incidents of violence, bullying/harassment are reported, investigated, and documented according to the procedure outlined below. Law enforcement is to be contacted as appropriate.
5. The parties involved in incidents of workplace violence, bullying/harassment are informed as per the procedure outlined below and are provided support such as debriefing, training, or referral to external resources.
6. Workers, supervisors, and support home operators receive training on legislation, policy, procedure, hazard recognition and controls, reporting, obtaining assistance, investigating and documenting in regard to workplace violence, bullying/harassment. Clients receive training/education in regard to appropriate interactions and how to report instances of violence, bullying/harassment.
7. Management, with the involvement of Health and Safety Committee members, maintains records of incidents of workplace violence, bullying/harassment and reviews/revises this policy and associated training as needed.

B. Responsibilities:

I.C.E. will ensure this policy and the supporting procedures are implemented and maintained. All workers and supervisors will receive relevant information and instruction on the contents of the policy and procedures.

Supervisors will adhere to this policy and the supporting procedures. Supervisors are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Supervisors and management will:

1. Ensure all interactions with employees/support home operators and the general public are courteous and respectful.
2. Promote awareness of policy and compliance.

3. Be aware of what constitutes workplace violence, bullying and harassment, report any observed incidents and take action to resolve the behaviour before it escalates.
4. Investigate and complete corrective actions to address reported incidents of violence, bullying, and harassment in an objective and timely manner.
5. Deal professionally with both the target and the alleged offender.
6. Provide appropriate support for the person to whom the behaviour is directed (the target).
7. Ensure any employee/support home operator whistleblowing (reporting) such incidents will be supported and is free from retaliation for reporting the issue.
8. Ensure the confidentiality of the complaint including the circumstances related to the incident of violence, bullying, and harassment, and the names of the complainant, the alleged offender and any witnesses except;
 - a. When necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident,
 - b. Where necessary to inform workers of a specific or general threat of violence or potential violence, or
 - c. as required by law;
9. Only disclose the minimum amount of personal information that is necessary to inform workers of a specific or general threat of violence or potential violence as per section B(8)(b) of this policy.
10. Monitor the situation to deter future recurrences of the behaviour.

Every worker must work in compliance with this policy and the supporting procedures. All workers are required to raise any concerns about workplace violence and bullying/harassment and to report any incidents to the appropriate person.

Workers/support home operators will:

1. Treat all I.C.E. personnel, support home operators, clients and members of the public with dignity and respect.
2. Report any incidence of workplace violence, bullying/harassment that is observed whether directed at them or not.
3. Cooperate with any investigation.

4. Accept and practice any preventative strategies that the agency introduces to deter this inappropriate behaviour.
5. Recognize that workplace violence and bullying/harassment will not be tolerated and the agency will enforce disciplinary measures should it occur.

C. Procedures:

If an incident of workplace violence or bullying/harassment occurs:

1. Ensure the safety of all parties. **If there is imminent danger, emergency services are to be immediately contacted (call 911).** Emergency plans for violence at work are to be followed. **Refer to the Health and Safety Manual – Section 5 Emergency Response Action Plan for mitigations / emergency response for serious incidents including: Workplace Violence by a Client / Clients family member, Workplace Violence by a Community Member and Workplace Violence Related to Domestic Violence, Workplace Violence by an Employee.**
2. If it is safe to do so, the target will make their feelings known verbally to the alleged offender, directly or with the assistance of a third party. It is imperative that the alleged offender be immediately made aware that their behaviour or conduct is offensive to the target and be given an opportunity to cease the behaviour.
3. The target will report the situation to their supervisor or the appropriate manager. In the event that the complainant's manager / supervisor (or designate) is the respondent, the next senior position in the respective department shall be alerted.

D. Reporting an Incident:

1. The person reporting the incident will record details of the incident(s) on a Critical Incident Report form including date(s) and time(s), nature of the behaviour(s), and names of any persons who may have witnessed the behaviour. **Refer to Policy 2.7.3 Critical and General Incidents.**
2. The supervisor will ensure the Critical Incident Report is completed and the appropriate process for resolution/investigation is started. The supervisor is to inform the COO/President of the situation and update them as required throughout the process.

I.C.E. will investigate and take appropriate corrective actions to address all incidents and complaints of workplace violence and bullying/harassment in a fair, respectful and timely manner. I.C.E will cooperate with investigations conducted by external agencies to the extent required by law. I.C.E may review or investigate suspected incidents of workplace violence in the absence of a formally reported incident.

E. Incident Investigation:

When incidents of violence or bullying/harassment are reported I.C.E. has two processes to respond to allegations. Depending on the severity/complexity of the allegation the agency will either address the matter in an **informal resolution process** or a **formal investigation**. I.C.E. will cooperate with investigations conducted by external agencies to the extent required by law. I.C.E. may review or investigate suspected incidents of workplace violence in the absence of a formally reported incident.

The process for informal resolution and formal investigation is detailed on the **“Harassment/Bullying/Violence Investigation Flowchart”** attached to this policy.

F. Informal Issue Resolution Process:

This process is used to address more subtle forms of bullying/harassment:

1. Upon receiving the Critical Incident Report form, the manager/supervisor will determine the nature of the complaint and, if deemed appropriate for the informal resolution process, will notify the target and alleged offender.
2. The manager/supervisor will determine appropriate corrective action such as: mediation, disciplinary action, change in work duties, etc.
3. The supervisor will ensure the corrective action is carried out.
4. The follow-up regarding the complaint/allegation will be documented on page 2 of the Critical Incident Report detailing the alleged bullying/harassment.
5. The supervisor will follow-up with both parties to ensure the situation has been resolved and will document the follow-up.
6. I.C.E. personnel involved in following up the complaint/allegation will ensure the target is neither penalized nor retaliated against as a result of making the complaint.

G. Formal Investigation:

I.C.E. has resources accessible and on-site to de-brief with the individual, conduct an impartial investigation and make decisions about future action. These resources include personnel trained in completing investigations and knowledgeable in Human Rights Legislation. They will be viewed as impartial and non-biased. A formal investigation will take into consideration: the need for prompt action to mitigate hazards, complete and accurate documentation, confidentiality of those involved, and the priority of maintaining the safety of the target throughout the process.

A formal investigation proceeds as follows:

1. Upon receiving the Critical Incident Report form, the manager/supervisor will determine the nature of the complaint and, if deemed appropriate for a formal investigation, will notify the target and alleged offender.
2. Management will determine who will conduct the investigation using the Investigation Report. **Refer to the Master Forms Binder - General Section re: the Investigation Report.**
3. The target, the alleged offender, and any witnesses will be interviewed and each interview will be documented.
4. I.C.E personnel involved in following up the complaint/allegation will ensure the target is neither penalized nor subjected to any prejudicial treatment as a result of making the complaint.
5. The manager, in consultation with a senior manager representative, shall ensure that at the conclusion of an investigation, the:
 - a. Respondent will be notified in writing of the investigation conclusion and of corrective actions, if any:
 - b. Complainant will be notified in writing of the investigation conclusion and corrective action, subject to applicable legislation, bylaws, or I.C.E. policies: and
 - c. Reported incident may be forwarded, as required or permitted by applicable law, to external agencies including but not limited to, the appropriate law enforcement agency.
6. Depending on the outcome of the investigation (founded/unfounded), management will determine corrective action, which is dependent upon the severity of the incident. Such action may include education, supervision, verbal reprimand, and mandatory counseling, and written reprimand, suspension without pay or termination of employment for cause.
7. The agency will provide follow up and support for both the target and the alleged offender according to the corrective plan.

I.C.E. pledges to respect the privacy of all concerned as much as possible. I.C.E. will not disclose the circumstances related to an incident of workplace violence and bullying/harassment or the names of the parties involved (including the complainant, the person alleged to have committed the harassment, and any witnesses) except where necessary to investigate the incident, to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, or as required by law.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving workplace violence and bullying/harassment. Retaliation against an employee who reports an incident of workplace violence will be investigated by agency management and may lead to disciplinary action. This workplace violence and bullying/harassment prevention policy does not discourage a worker from exercising the worker's right under any other law, including the Alberta Human Rights Act.

Policy will be reviewed after an incident related to violence and/or harassment or if the Health and Safety Committee recommends a review.

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3.8.1 PROFESSIONAL CONDUCT

As an employee of Independent Counselling Enterprises Inc., certain standards of Professional Conduct are expected to be maintained at all times.

1. Independent Counselling Enterprises employees are expected to conduct themselves as professionals while representing the agency at all times.
2. The employee is to ensure that the client's rights (see **Policy 2.2.1 Client Rights and Responsibilities**) are maintained.
3. Employees will maintain a professional approach with clients, their support network, other professionals and their coworkers. The employee is therefore to refrain from use of profanity, shouting, issuing of verbal or physical threats, malicious gossip and the use of statements that are slanderous or considered to be abusive. Professional boundaries are to be maintained between the client and the employee as well as with the client's support network.
4. Employees have the responsibility to:
 - Be punctual
 - Be properly prepared for each assignment.
 - Perform job duties in accordance with the agency's policies and procedures.
 - Complete appropriate documentation accurately and within specified time frames.
 - Only work what has been assigned or scheduled and not to alter a working shift in any way unless approval from the appropriate supervisor had been obtained.

5. Supervisor/subordinate romantic relationships, even if consensual, carry the risk of creating favouritism, or a perception of favouritism. As a result, supervisor/subordinate romantic relationships are strongly discouraged. In the event they do develop or exist, the supervisor is obligated to immediately bring the situation to the attention of his/her supervisor/manager.

Each situation will be reviewed by the supervisor/manager. I.C.E. will seek voluntary cooperation of the individuals involved to remedy the situation and will explore possible resolutions to avoid conflicts of interest, such as reassignment if another position is available. If voluntary measures are not taken and the individuals wish to continue the relationship, I.C.E. reserves the right to transfer or terminate the employment of either employee.