

Preventing Violence in the Workplace

Bell Corporate Health and Safety policy

The Policy

1. Summary	3
2. Scope and audience	4
3. Purpose	5
4. Definitions	6
5. Violence prevention	7
i. Bell's commitment	7
ii. Application of policy	7
iii. Violence prevention practices	8
iv. Warning signs	9
v. Violence prevention tools & references	10
vi. Roles and responsibilities in violence prevention	11
6. Confidentiality / Privacy	13
7. Reporting incidents	14
8. Providing assistance to employees who have been exposed to workplace violence	16
9. Non-compliance	17
10. Appendices	18

1. Summary

To ensure a successful culture within Bell, it is essential to respect ethics, confidence and diversity. A work culture based on these values enables and cultivates deep and rich relationships with colleagues, clients, business partners and shareholders.

Bell's commitment to fostering a violence-free workplace

[Violence](#) can happen in any workplace and can have a serious impact on employees, their families and the way we do business. Bell is committed to protecting employees from violence in the workplace and the Violence Prevention Policy describes this long standing commitment. This Policy applies to all employees in all locations where Company business is conducted. Contractors, sub-contractors and third party service providers must also adhere to the requirements of this Policy.

Bell will not tolerate acts of violence in the workplace. This applies whether the aggression is committed by one employee against another, or against (or by) anyone else an employee comes into contact with when carrying out his or her responsibilities.

Promoting a violence free culture starts with prevention

To ensure that employees are able to recognize the signs of escalating violence and know what to do to help prevent violence in the workplace, a series of training and tools have been developed and are referred to in the Policy. Executives will also promote a violence-free culture within their organizations.

Responsibilities

Every member of the Bell organization, at every level, is expected to act in a responsible manner when faced with situations of violence. This includes being vigilant and responding to and reporting any act or threatened act of violence, whether against themselves or others. **In situations of imminent danger call the police first, and then contact Corporate Security.**

Providing assistance to employees who have been exposed to workplace violence

The first step in responding to an employee who has been exposed to violence is to provide support and assistance to the employee. A series of tools including [Employee and Family Assistance Program](#) (EFAP) and other support contacts has been developed and is referred to in the Policy.

2. Scope and audience

This Policy applies to all Bell companies, their respective affiliates, subsidiaries, other controlled entities and controlled joint ventures whose equity securities (i.e., common shares and preferred shares) and debt securities are not publicly traded (collectively, “Bell”). For the purpose of this policy, we will refer to “Bell” or the “company” interchangeably and this will represent an inclusive definition that encompasses Bell employees, contractors, sub-contractors and third party service suppliers.

The Policy applies to all employees (independent of their level or role in the company) in all locations where Company business is conducted, whether on Company or customer premises. This policy also applies in other locations (even outside normal business hours) when work related. Incidents are deemed work related when there is a work relationship between the parties involved and that various personal or business factors within this relationship create the cause for violence.

Contractors, sub-contractors and third party service providers must also adhere to the requirements of this Policy in executing their contract.

A copy of this Policy is available on the Bell Corporate Policies and Ethics programs website site in the My Workplace section: [Corporate Policies and Ethics Program](#)

3. Purpose

This policy describes the Company's commitment to take proactive preventative measures to minimize the risk of violence in the workplace.

Company culture

Nothing is more essential to ensuring the company's successful culture than the respect of ethics, confidence and diversity. A work culture based on these values is an added advantage within the workplace because it enables and cultivates deep and rich relationships with colleagues, clients, business partners and shareholders.

Our culture promotes a "zero tolerance" approach under which violence of any kind is not tolerated and will result in disciplinary measures up to and including termination for just cause.

Our company is committed to promoting a work environment where:

- The dignity and personal values of each employee are recognized
- Diversity of ideas from employees, clients, suppliers and shareholders are valued and encouraged
- Each employee may work without fear of intimidation, harassment, discrimination and/or other types of violence

Promoting right behaviour

Our corporate values and expected behaviours reflect the importance of "how" we embody professionalism in the workplace with our clients and our employees as well as "how" we demonstrate the right behaviours, such as:

- Treating each person with respect and dignity
- A work environment where the team can bring value and take pride in their work
- Communications that are based on constructive and continual feedback

Fair and consistent process

Complaints made regarding incidents of violence will be treated using a fair and consistent process. The approach will be "fact based" and neutral, aimed at understanding and addressing root causes.

Beyond regulatory and legal compliance

Bell recognizes that it has legal obligations related to preventing violence in the workplace and responding to incidents of violence. Bell intends to not only meet its legal obligations but set progressive standards for preventing violence in the workplace and responding to violent incidents.

4. Definitions

Workplace violence is:

“any action, conduct, threat or gesture of a person towards an employee in their workplace that can reasonably be expected to cause harm, injury or illness to that employee”*. It includes such violence when it occurs in the course of employment over which the Company has control.”

Workplace violence that can reasonably be expected to cause harm, injury or illness to that employee notably includes:

- Threatening behaviour – for example, a gesture using a fist, destruction of material/equipment, throwing objects
- Harassment – is vexatious behaviour that is repetitive and hostile or unwanted that degrades, humiliates, embarrasses, affects or insults an employee’s dignity or integrity and that results in a harmful work environment for the employee
- A single serious incident may also be considered psychological harassment if it affects the employee to the point of having a continuous adverse effect on him/her
- Written or verbal threats /Verbal assaults – profanity, insults, or abusive language
- Physical aggression — Unwanted physical contact, brandishing a weapon or an object, hit or punch, to push or to shove and even more aggressive types of violent behaviour
- Bullying and mobbing – A form of psychological (occasionally physical) harassment, done by one person (bullying) or a group (mobbing), consisting of negative remarks aimed at isolating and tormenting an individual

The workplace includes all work locations where an employee is required to be in the circumstances of his or her work. It may include Company or customer premises or other transitory locations.

A person who has a personal relationship with a team member – such as a spouse or former spouse, current or former intimate partner or family member – may physically harm, or attempt or threaten to physically harm, that employee at work. In these situations domestic violence is considered workplace violence.

Acts of violence may occur as a single incident or as an event resulting from a series of exposures to factors.

The conduct may be intentional or unintentional.

Workplace violence is *not*:

It is not the exercise by the manager of reasonable and legitimate management rights and activities such as the assignment of tasks, the management of performance, managing absenteeism or presence at work, the application of disciplinary action etc. These actions do not constitute violence.

In the case of performance management and or improvement programs, there is a due process to ensure the employee is met on a regular basis. Frequent meetings can be conducted in order to set and clarify expectations, coach for improvement and monitor progress. This is considered due process; it is applied in a consistent manner for all employees and should not be mistaken for harassment. Informing an employee of the consequences related to his or her performance and conduct is part of the normal process.

Work conflict does not usually constitute violence. Usually a conflict is the expression of different perspectives or ideas, and is a way of clarifying issues.

* Definition from: Part 20 of the *Canada Occupational Health and Safety Regulations* (COHS Regulations), pursuant to Part II of the *Canada Labour Code* (Code)

5. Violence prevention

i. Bell's commitment

This policy sets out the Company's commitment to:

- Provide a safe, healthy and violence-free workplace
- Dedicate sufficient attention, resources and time to address factors that contribute to workplace violence including, but not limited to, bullying, teasing, and abusive and other aggressive behaviour and to prevent and protect against it
- To provide employees with information and training about factors contributing to workplace violence
- To assist employees who have been exposed to workplace violence
- To provide an impartial and consistent method of treating complaints
- To investigate as soon as possible (if required)
- To develop recommendations of corrective measures and improvements in order to reduce the risk of violence
- To control and continually update the workplace violence policy with improvements related to our workforce practices

ii. Application of policy

In its application of the policy, the Company:

- Is committed to a "zero tolerance" approach when confronted with a violent situation
- Will take necessary measures on a case by case basis
- Expects every member of the Bell organization at every level to act in a responsible manner when faced with different situations of violence
- Will act in a manner that will not leave the employee(s) vulnerable to further escalation of the situation
- This policy is developed in the context of new regulation, but the actual intent is to go beyond legal requirements to establish a best-in-class working environment

Violent behaviour will not be tolerated and could result in disciplinary action appropriate to the severity of the incident, up to and including dismissal. It may also result in civil or criminal prosecution.

iii. Violence prevention practices

Violence prevention can only work if there is a spirit of respect and cooperation among employees in an environment where everyone takes responsibility for their actions.

Bell is committed to having a violence prevention program and tools which include awareness and training.

Preventative measures can normally be categorized into three general practice categories:

- Work environment security
- Administrative practices
- Workforce practices

Work environment security

Conception of the work environment usually refers to factors such as layout, use of signs, locks, physical obstacles, lighting and electronic surveillance. Security in buildings is an area where layout and planning are very important. We need to consider the following:

- Ensure any reception areas, sales & customer service can be seen by other employees and/or public
- Have enough lighting both outside and inside the building and close to exits

Administrative practices

Administrative practices are the outcomes of decisions that are made in the general management of the business. Examples of such administrative practices are:

- Ensure personal belongings and company property are stored securely whether on company premises or on personal property (e.g. employee's vehicle)
- Using appropriate call center procedures to manage calls where profanity or yelling takes place

Workforce practices

Workforce practices refer to defined and established processes related to how people perform their job. People working in non-conventional environments (such as providing services on customer premises) may adopt different work practices to reduce the risk of violence such as the following:

- Develop a daily work plan so people know where you are at specific times of the day
- Designate a contact person at the office and an emergency contact
- Do not enter a situation or a place where you feel threatened or where there is a lack of security

Examples of risk factors

Certain work processes, situations and interactions can increase risk of workplace violence, for example:

- Call centre representatives: may be exposed to an angry customer
- Face to face sales representatives: may be faced with intimidation from a customer
- Operators: may face profanity
- Working alone in a remote area or in small numbers: may leave employees vulnerable
- Technicians on the road: may be exposed to frustrated drivers (road rage)

iv. Warning signs

Physical signs* of a potentially violent person

Use caution if someone exhibits one or more of the following non-verbal signs or body language:

- Red-faced or white-faced
- Exaggerated or violent gestures
- Sweating, pacing
- Restless or repetitive movements
- Trembling or shaking
- Clenched jaws or fists
- Facial grimacing
- Change in voice
- Loud talking or chanting
- Scowling, use of abusive language
- Glaring or avoiding eye contact
- Violating your personal space

NOTE: * Some of these signs might also be related to certain personal health issues

Other warning signs of a potentially violent person

A random act of violence or crime-related violence is often sudden and unpredictable. There may be few or no warning signs. However, in some cases there has been a clear pattern of warning signs. No one can predict human behaviour, and there is no specific profile of a potentially violent person. Nevertheless, a potentially violent person may exhibit any or all of the following characteristics:

- History of violence
- Threatening behaviour
- Intimidating behaviour
- Increase in personal stress
- Negative personality characteristics
- Socially isolated
- Abuses drugs or alcohol

v. Violence prevention tools & references

Training	
<p><u>Bell</u></p> <p>(mandatory under the regulation for all Bell employees and contractors)</p> <p>Violence Prevention in the Workplace: courses available on the CDC in French (L1027 F) and in English (L1027 E)</p>	<p>For non-management employees and contractors, sub-contractors and third party service suppliers, detailed information outlining best practices can be found in Accident Prevention Process (APP) Module 008: APP 008</p> <p>For leaders, a new interactive online course includes the main highlights related to this policy.</p> <p>This course will be mandatory and free.</p>
<p><u>Shepell fgj</u></p> <p>Prevention of violence in the workplace (under development)</p> <p>Respect in the workplace: courses D 223 & D 224</p>	<p>This training is available for all employees (for groups of minimum 10 people).</p> <p>Session billed to the business unit (registration completed online through the CDC – course number to be determined)</p> <p>850\$/session billed to the business unit (registration can be done online through the CDC)</p>
<p><u>Canadian Centre for Occupational Health and Safety (CCOHS)</u></p>	<p>CCOHS website - Training</p>

Useful references	
Violence Prevention handbook CCOHS	CCOHS website - Violence Prevention Handbook
Canadian Centre for Occupational Health and Safety website	CCOHS website
<p><u>Internal website references:</u></p> <p>Bell Code of Business Conduct</p> <p>Supplier Code of Conduct</p>	<p>Bell Code of Business Conduct</p> <p>Bell Supplier Code of Conduct</p>

vi. Roles and responsibilities in violence prevention

NOTE: In situations of imminent danger call the police first and then Corporate Security

- **Police 9-1-1**
- **Corporate security: 1- 866 -714 -0911 / email: security@bell.ca**

Employees

- Maintain work relations based on respect for individuals and accept responsibility for the effects of their behaviour on others
- Be aware of the details of this policy and understand their implications
- Report any act whether against themselves or others, or threatened act, of violence to a manager, HR or to Corporate Security. In situations of imminent danger call the police and Corporate Security
- Report any factor not yet identified that may contribute to workplace violence
- Change their behaviour as necessary when reasonably aware or advised that another individual objects to their behaviour or words. Such notice may be given by the individual or by another person
- Employees are expected to document the facts around a complaint and cooperate during the investigation. However, employees who deliberately make false statements may be subject to disciplinary measures up to and including dismissal

Leaders

In addition to their responsibilities as employees, leaders also have specific responsibilities.

- Set an example through their behaviour
- Create and maintain a work environment free from any form of violence (zero tolerance)
- Inform new employees of Bell's Violence Prevention in the Workplace, Diversity, Employment Equity, Human Rights and Reasonable Accommodation policies and regularly review them with current employees. Leaders must ensure that the violence prevention training is made available to all their employees
- Search for early warning signs that an employee may become violent and do everything reasonably possible to provide assistance to the employee and to take action to seek the appropriate help
- Leaders have a responsibility to manage complaints that they become aware of. In some cases, employees may not want to be identified due to fear. Leaders must mitigate the risk of escalation and ensure a safe workplace
- When a supervisor becomes aware of a risk of workplace violence from a person who has a history of violent behaviour, the supervisor must contact their Human Resources consultant for advice
- Appropriate administrative or disciplinary measures (when required) should be used to control intentional and unintentional conduct not suitable in the workplace, even when it cannot be determined that the conduct could reasonably be expected to cause harm

Corporate Health and Safety representatives

- Assist business units to implement the policy and to communicate and train employees

- Monitor and track compliance with the policy
- Maintain and update the policy on a regular basis (at least once a year)
- Report to the regulator as required
- Facilitate the resolution of policy management and administrative issues

Human Resources and Labour Relations consultants

- Receive and analyse complaints of an employee
- Support the managers with respect to this policy and in the choice of appropriate measures to apply as required
- Conduct preliminary complaint intake and document the pre-investigation summary questionnaire
- In the case where an employee submits a grievance related to a given situation of workplace violence, if required the LR consultant will work jointly with the local management and the Union in order to determine the appropriate next steps

Corporate Security

- Be the sole point of contact for security matters and investigative training
- Assist other groups, such as Health and Safety and HR, in promoting and, when required, supporting this policy
- Provide a central number for reporting
- Investigate cases of reported workplace violence and/or assist the investigation as required if performed by other resources appointed to that task
- Report investigative findings to pertinent parties for resolution/disposition of the matter
- Interact and engage external parties such as Law Enforcement as necessary and if required

Union

- Work in collaboration with management to ensure a work environment that is exempt of violence
- Represent its members, both victims and the aggressors

Investigator

- Remain informed at all times of laws, regulations and best practices relating to this policy and workplace violence
- Act in a neutral fashion while being empathic towards all parties
- Investigate all the facts related to an incident and interact with all key parties
- Guide and coach all stakeholders throughout the investigation
- Apply a consistent methodology and centralize all complaint reporting
- Provide non-confidential and pertinent (disclosable) information as required to Corporate Health and Safety committees in order to assess and put in place prevention measures

6. Confidentiality / Privacy

Handling complaints concerning violence in the workplace involves working with very sensitive personal information. Some individuals will only agree to report an incident, as complainant or witness, if they can be assured that the information that they disclose will remain confidential.

Discretion

The first step in protecting personal information in these situations is to use discretion. This means that information revealed by any of the parties involved should only be used and retained if it is relevant to the complaint. And information should only be disclosed to individuals who need the information.

Disclosure

A complainant should know that some of the information that they provide will be disclosed to other parties so that the complaint can be handled effectively. In most cases, an individual who is accused of violent behaviour has a right to know who made the complaint as well as details concerning the complaint. Some information will also be disclosed to other parties: witnesses and senior management responsible for decisions about actions that may result as an outcome of the process. However, information may be withheld in situations where disclosing the information can reasonably be expected to result in a serious threat to an individual's safety.

All parties should know that the company may be required to act on information if it indicates that a law or an agreement has been or will be violated, or if there is reason to believe that an individual's health or safety is at risk.

Privacy

Bell is committed to protecting personal employee information. For more information on this topic please consult the Privacy section of the Human Resources website at: [PRIVACY](#) .

7. Reporting incidents

An employee who experiences or observes an act of violence has a duty to report it to the Company as soon as possible.

Immediate contacts for reporting incidents:

Police	Telephone: 9-1-1 (where available)
Emergency services if there is an injury	Telephone: 9-1-1 (where available)
Corporate Security	Telephone: 1- 866- 714- 0911 e-mail: security@bell.ca
Local Human Resources consultant	Obtain contact information from your immediate leader or Administrative Assistant or send an email request to the following address: Info.ss-hs@bell.ca

Violence incident reporting process for persons who have experienced (or witnessed) workplace violence

- Inform the person that their behaviour is unwanted and unwelcome. Should you need assistance, a manager, supervisor or employee representative can assist you
- Document all events, including time, date, and names with your manager or supervisor (or your Human Resources consultant). The company representative can help guide you through the next steps (if required)
- If additional support/assistance is required because it cannot be resolved locally, then submit a formal complaint to your leader and/or HR representative and/or union representative
- If any employee is a witness of workplace violence, he or she must report the incident

Investigating matters that cannot be resolved locally

It is always preferable to resolve situations informally as a first step in order to address tensions quickly.

If the matter cannot be resolved amongst the parties involved, and perhaps with some assistance, the matter should then be reported through the identified process described in appendix 1.

Upon receiving a formal complaint, the company representative will assess the situation. In cases where the situation could apply to other employees, the company representative will recommend controls and take immediate actions to prevent further incidents.

We encourage the complainant, to document the facts as soon as possible with the help of the company representative (if needed), in writing as soon as they are able to do so, in order to remember all relevant details that can support the investigation.

The investigator will provide non-confidential and pertinent (disclosable) information as required to Corporate Health and Safety Committees in order to orient and put in place preventative measures.

Other parallel processes include:

- **Informal escalation:** this involves a discussion with local management (sometimes facilitated by HR) in an attempt to resolve the situation as quickly as possible without resorting to formal processes
- **Union**
 - **Informal escalation:** local union representatives can help facilitate resolution of issues (especially if the conflict resides between unionized parties)
 - **Grievance:** for unionized employees, the victim or the presumed aggressor can consult their union rep in order to submit a grievance
- **Corporate security investigation:** in the event of a physical assault, the incident must be reported to Corporate Security who will determine next steps in order to protect people and the work environment
- **Health and Safety**
 - **BC 976 and BC 976 B:** In the event of a physical &/or psychological assault (for example: a threatening verbal assault) involving injury to one or more employees, the BC 976 form and reporting process is used when an employee is injured and reports an incident. In the event of a “hazardous occurrence”, then the BC 976 B form must be filled in
 - **WSIB** (Workplace Safety and Insurance Board), **CSST** (Commission Santé et Sécurité du travail) and workers compensation claims: The 1940 form « Employer’s Notice and Reimbursement claim » (CSST Québec) or the Form 7 (WSIB Ontario) must be completed for a work injury which resulted in lost time, restricted work and medical treatment
- **Criminal incidents:** in the case of physical aggression, an employee should report the incident to the appropriate law enforcement authorities. Employees, who elect to do this at their own initiative, must seek their own private counsel. Employee may contact Shepell-fgi for legal support if they choose to

8. Providing assistance to employees who have been exposed to workplace violence

The first step in responding to an employee who has been exposed to violence is to provide support and assistance to the employee.

It may sometimes be necessary to provide the employee with specialized support such as counselling. In these cases the Human Resources consultant should be contacted

Available support contacts:

Employee and Family Assistance Program (EFAP); also referred to as EAP (Employee Assistance Program)	For immediate help – 24 hours a day, 365 days a year – call: English Service: 1-800-387-4765 French Service: 1-800-361-5676 Internet: Shepell-fgi Website (http://www.workhealthlife.com/Login.aspx?id=801357561814982489613273&oid=327&lang=en) E Counselling: https://www.shepellfgiservices.com/ec/index1.asp
Shepell fgi Trauma Response Service	Specialty trained trauma counsellors available 24/7 who respond directly in traumatic events
Employee's personal emergency contacts	Available through the ESS (Employee Self Serve) website under personal information, they can be obtained from Administrative Assistant via SAP
Human Resources	Obtain contact information from your immediate leader or Administrative Assistant or for assistance in finding out who your HR consultant is, or please contact via email the following address: Info.ss-hs@bell.ca
Investigator contact information	Contact your HR consultant
Local Health and Safety Committees	http://portmid.bellnet.bell.ca/portal/page/portal/BCE_HR/HOME_PAGE/BELLCANADA/HEALTH_SAFETYANDWELLNESS/HEALTHSAFETYCOMMITTEES
Provincial Health and Safety coordinators	http://portmid.bellnet.bell.ca/portal/page/portal/BCE_HR/HOME_PAGE/BELLCANADA/HEALTH_SAFETYANDWELLNESS/HEALTHANDSAFETYOVERVIEW

9. Non-compliance

Any violation of this policy can be grounds for disciplinary measures up to and including dismissal. Consequences will be established jointly between the Business unit and the HR consultant.

It is up to the business unit to apply appropriate measures or sanctions (if required) upon receiving recommendations from HR.

Contractors, sub-contractors and third party service providers who contravene this policy risk termination of their contract with Bell Canada. Bell will not defend or indemnify any employee in violation of this policy who is being sued or prosecuted in connection with any illegal, unethical, prohibited or irresponsible action.

Should the aggressor remain in service within the company, the appropriate support mechanisms will be provided and could be mandatory for the continuation of employment (e.g.: anger management meetings through the EFAP program and other face to face type counselling, etc...).

10. Appendices

Appendix 1

A. Policy/Practice Details	
Issuing BU	Human Resources
Policy/Practice sponsor	Lucie Dutil, VP- Human Resources
Policy/Practice owner	David Wells, EVP Corporate Services
Primary contacts	Marie-Nicole Audette / Simeon Doucette
Required approval process	Committee responsible for the violence prevention program Dominique Benoit Lucie Dutil David Wells
Issue date	(to be confirmed)
Effective date	(to be determined)
Review cycle	At least once every year

B. Revision History				
Date	Change Owner	Changed by	Version	Description
2010-10-21	Marie-Nicole Audette & Simeon Doucette		Final	

Appendix 2

Process to follow in case of workplace violence

