

## **CALGARY HOUSING COMPANY POLICY:**

### Unacceptable Behaviours & Workplace Violence Policy

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**Policy Number:** CE-Unacceptable Behaviours & Violence-004  
**Approved By:** CHCELT  
**Effective Date:** 2017/11/01  
**Next Revision Due:** 2025/03/04  
**Policy Owner:** Customer Experience Vice President

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#### **BACKGROUND**

Our customers, whether in Calgary Housing Company housing or applying for housing, are at times in crisis and can display a range of cognitive, emotional and behavioural responses.

Our aim is to ensure that expressions of dissatisfaction from our customers are dealt with in the best way possible. CHC welcomes customer concerns as valuable feedback, and wherever possible, staff work to de-escalate problems to enable a customer's complaint to be investigated.

CHC is committed to providing a respectful workplace for staff and respectful services to customers. CHC respects the rights and dignity of the people it serves and treats them in a non-coercive manner. In turn, we expect our staff to be treated courteously and respectfully. Violence or abuse is unacceptable and will not be tolerated.

The work performed by CHC has the potential for staff to encounter violence or harassment in the workplace. CHC will make every reasonable effort to:

- Cross Cultural awareness and tolerance training
- Train management and staff
- Identify sources of violence and harassment
- Establish reporting requirements through Safety Database Management System (SDMS) and procedures to address unacceptable behaviours
- Reduce or eliminate the risk of violence
- Implement policies and procedures to maintain respectful environments and services

We understand that customers may sometimes be angry or upset. However, it is not acceptable when anger about an issue escalates into aggression directed towards staff or other customers

Aggression is not restricted to acts that may result in physical harm. It also includes behaviour or language (spoken, unspoken through body language or written) that may cause staff to feel afraid, intimidated, threatened, harassed, or abused.

Threats or acts of violence may be potentially higher in situations where staff are:

- Carrying out inspections or enforcement duties (e.g., addressing complaints or eviction notices)

- Conducting site visits for any reason
- Completing an Annual Rent Review or reviewing a request for Rent Adjustment
- Situations where there is potential for emotional outbursts or frustration of anger (e.g., denial of services, rent increase, or long wait times at the customer service desk)
- Working with or around persons that may be under the influence of drugs or alcohol
- Working alone or in isolated situations

## PURPOSE

CHC is committed to providing a safe and healthy work environment for all staff by developing and maintaining proactive policies, procedures, and awareness programs. The purpose of this policy is to provide Calgary Housing Company staff with guidance for dealing with unacceptable or abusive behaviours from customers and outlines expectations of staff and CHC in reporting and responding to unacceptable behaviours. This Policy is supplemental to the City of Calgary’s “Workplace Violence Prevention Policy and Procedures” and “Respectful Workplace Policy”. The City of Calgary policies referenced above, guide and outline expectations for employee behaviors towards customers and members of the public, as well as The City of Calgary Code of Conduct. For more information on City of Calgary employee Code of Conduct, visit [here](#).

## DEFINITIONS

In this policy:

- “Customer” means any person(s) who either lives in CHC-managed housing<sup>1</sup> or their guests/visitors/relatives who may be on-site, attend the office with them or act on their behalf in any capacity, or are applying for CHC-managed housing;
- “Damage,” as defined under the Residential Tenancies Act, refers to harm to property or person.
- “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, and includes (i) 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 (ii) a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site.
- “JWHSC”: refers to CHC’s Joint Workplace Health and Safety Committee
- “Job Hazard Assessment” (JHA): is an action performed prior to working that identifies job task hazards and controls to prevent an incident. It focuses on the worker, the tasks, the tools, the equipment and the work environment;
- “SDMS” refers to The City’s Safety Data Management System;

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<sup>1</sup> Including CHC Rent Supplement Program

- g) “Staff” means both management and non-management staff (unionized or exempt), part-time, on-call, and temp workers of CHC
- h) “Threat” means any act, gesture, or statement that gives a staff member or another person reasonable cause to believe that there is a risk of injury to themselves or another person or damage to property.
- i) “Unacceptable Behaviour” is a single or repeated action that is objectionable or unwelcome and negatively affects an individual or the workplace. This includes but is not limited to any actions, words or physical gestures that could reasonably be perceived to cause another person distress or discomfort. Refer to the harassment definition for examples.
- j) “Violence” means whether at a work site or work-related, means 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;
- k) “Workplace” refers to any location where a worker is, or is likely to be, engaged in any occupation and includes any vehicle or mobile equipment used by a worker in an occupation.
- l) “Workplace Violence” are actions that are perceived to be intimidating, frightening, or threatening to employees and that generate a genuine concern for personal safety. These actions can include direct, conditional or veiled threats, stalking, and aggressive harassment.

## **INTENDED POLICY OUTCOMES**

This policy aims to support good practices to address unacceptable behaviours and the prevention and management of threatening behaviours and violence between CHC and customers.

## **POLICY**

### **1. Scope**

- 1.1. This policy applies to CHC staff, supervisors, residents, visitors and applicants at any of the following places: CHC offices; CHC-managed properties; other locations visited by staff and customers while on CHC-related business, including CHC rent supplement programs.

### **2. Prevention and Assessment of Risk**

To effectively prevent and/or deter threats and violent acts from occurring, there is a need to determine specific risks in your work areas.

- 2.1. To help prevent workplace violence, leaders are responsible for the following:

2.1.1. Ensuring staff are familiar with The City's Workplace Violence Policy, CHC's Unacceptable Behaviours and Violence Policy, Respectful Workplace policies as well as relevant job hazard assessments and safe work guidelines.

2.1.1.1. Providing these resources as part of staff on-boarding and included in the safety orientation

2.1.2. Ensuring Job Hazard Assessments are complete for each role and supporting staff to implement outcomes, including issues and any actions taken to eliminate or reasonably minimize risk. Job Hazard Assessments are to be reviewed at a minimum every three years per City requirement.

2.1.2.1. Job Hazard Assessments must address specific criteria including, but not limited to:

- a. The physical layout of the work area;
- b. Work routines, schedules, procedures and practices;
- c. Geographical location, hours of operation, and staffing complements;
- d. Past incidents or occurrences of threats or violent acts;
- e. Risk of threats and violence in the workplace.

2.1.3. Ensuring staff are trained in techniques to avoid escalating situations where applicable.

2.1.4. Educating staff on how to report incidents of unacceptable behaviours and workplace violence in CHC's safety reporting system - SDMS.

2.1.5. Identify tasks/actions that create a higher risk or probability of unacceptable behaviours or violence – this may include Annual Rent Review processes or evictions and develop mitigation strategies that may not be captured in the Job Hazard Assessment process.

2.1.5.1. Events identified as higher probability must be communicated to appropriate teams and staff that may be at risk and/or impacted and consider adding into the role Job Hazard Assessment.

2.1.6. When there are identified trends in reported incidences, CHCELT will be notified by CHC Safety Advisor, and trends will be analysed by the management team, Safety Advisor and JHSC (where appropriate) for preventative, corrective actions. It may be determined that Corporate Security needs to be involved, such as initiating a Threat Assessment Team, as referenced below.

2.2. Staff have a role in prevention by:

2.2.1. Participating in CHC-provided training that identifies warning signs of workplace violence; taking necessary precautions, including participating in training

opportunities and requirements as identified in the training matrix, Job Hazard Assessment, Job Evaluation Questionnaire and other associated documents; and maintaining professionalism

2.2.2. Take reasonable care to protect your health and safety and of other workers or persons in your workplace while working. This may include:

2.2.2.1. Mindfulness activities to be checking in with yourself

2.2.2.2. Working with partners or social service agencies to help mediate or work with a customer who has had unacceptable behaviours in the past

2.2.2.3. Using and promoting Language Line to ensure clear communication and understandings

2.2.2.4. Working with partner agencies or community advocacy groups to offer any accommodation for services required or requested

2.2.2.5. Ensure appropriate documentation and records are maintained in CHC's Information Management System (Yardi/Rent Café) and that these notes/records are compliant with FOIP

2.2.3. Reporting, in accordance with *this Policy*, any unacceptable behaviour incidents or warning signs they observe at work.

2.2.3.1. Considerations for reporting may differ based on individual employee's perception of an incident; additional guidance for reporting includes any unacceptable behaviour or warning signs of physical or psychological risk that any reasonable person would consider potentially injurious to themselves, their co-workers or others.

2.2.3.2. If you are unsure if an incident should be reported, please speak with your Supervisor and/or Safety Advisor.

2.2.4. Reflecting risk of unacceptable behaviour adequately in their Job Hazard Assessment when asked to assist in their re-evaluation

### **3. Training and Reinforcement:**

3.1.1. Verbal de-escalation training and strategies will be provided to staff for whom workplace violence is identified in the role Job Hazard Assessment (JHA) to teach non-physical skills to prevent potentially dangerous situations from escalating into physical confrontation or injury.

- 3.1.1.1. The level of training required is outlined in the position Job Hazard Assessment
- 3.1.2. Non-violent crisis intervention training will be provided to staff for whom workplace violence is identified in the role Job Hazard Assessment (JHA).
- 3.1.3. Scenario-based and table-top exercises and drills will be scheduled semi-annually by the Calgary Housing Leadership Team, with training and support from the Joint Health and Safety Committee for staff to practice and develop skills for verbal de-escalation and non-violent crisis intervention.
- 3.1.4. Quarterly drills of the Duress Alarm Procedure will be practiced at each District Office and led by a Leader Position (e.g. Team Leads, Coordinators).

#### **4. Physical Intervention**

- 4.1. Staff should not intervene in any violent situation.
- 4.2. If a situation presents an imminent threat to your safety or that of another person, you should:
  - 4.2.1. Quickly attempt to remove yourself from the situation and seek out a safe location;
  - 4.2.2. Activate the Duress Alarms
  - 4.2.3. Summon help from co-workers or other people in the area if it is safe to do so;
  - 4.2.4. **Call 9-1-1;**
  - 4.2.5. Contact Corporate Security and ask to speak with an Integrated Security Centre (ISC) Supervisor;
  - 4.2.6. Call your direct Supervisor for support and assistance.

#### **5. Non-Compliance Consequences**

##### 5.1. Unacceptable Behaviours in the Workplace

- 5.1.1. If a customer demonstrates unacceptable behaviours in one of CHC's Offices , through email, on the phone, or at one of CHC managed properties, the staff member is to provide a verbal warning of the unacceptable behaviour and utilize their de-escalations tools and trainings, including efforts to connect the customer with additional resources or appropriate services (e.g. translation services).
- 5.1.2. If the customer continues with the behaviour, the staff member is to end the interaction either asking the customer to leave CHC Office, or the staff member will leave the CHC managed property or hang up the phone to end the interaction.

- 5.1.3. If the customer continues the behaviour, and the employee requires assistance, they are to engage the Leader in Charge on site if the incident is in person, or their Supervisor if assistance is needed for conflict communication over phone or email.
- 5.1.4. If the customer continues the behaviour, the staff member may issue a Trespass Notice as per CHC Trespass Notice Procedure.
- 5.1.5. If escalation continues and the interaction cannot be ended safely, staff are to call Calgary Police or building security, activate the Duress Alarm if appropriate and must report the incident to the Health and Safety Advisor as a “injury” in Safety Data Management System (SDMS).
- 5.1.6. If there have been two separate incidences recorded in a **Residents** file a written notice will be sent to the resident iterating CHC’s “*Unacceptable Behaviour’s and Workplace Violence Policy*”. The written letter to the tenant will also reference *Section 21 of the Residential Tenancy Act – Tenant’s Covenant* and *Section 30(1)(b)*.
- 5.1.7. The written notice is to be mailed to the tenant requiring that they meet with the Property Manager and Tenant Liaison at the District Office to discuss corrective actions for the tenant.
- 5.1.8. Should the threatening behaviour continue, an eviction notice will be served by the Property Manager; if deemed unsafe the Property Manager will engage an external resource to deliver the notice, such as Calgary Police Services.
  - 5.1.8.1. Calgary Police Services will be involved if needed.
- 5.1.9. All interactions and communications (verbal and written) must be documented in case a file is opened with the Residential Tenancy Dispute Resolution Services.
- 5.1.10. If there have been two separate incidents recorded with an **Applicant** and recorded on file, a written notice will be sent to the Applicant iterating CHC’s “Unacceptable Behaviour and Workplace Violence Policy” and inform that continued, repeated behaviour may result in a Trespass Notice and Suspension or Removal from CHC’s waiting list and require a signed acknowledgment of CHC’s Respectful Behaviour Agreement.
  - 5.1.10.1. Should the behaviour continue, a Trespass Notice will be issued as per CHC’s Trespass Notice Procedure, and a corresponding suspension from CHC’s waiting list for housing may be issued as per CHC’s Suspension Policy.

## 5.2. Acts of Violence and Threats Against Staff.

- 5.2.1. **In the case of violence from a resident**, the staff member(s) is to call 911 immediately, and the Leader of Housing Programs and Services may activate the Threat Assessment Team, will complete a review and investigation of the incident and may issue a 24-hour notice of tenancy termination as per the Residential Tenancy Agreement.
  - 5.2.1.1. Where there has been an incident of violence against CHC staff, detailed notes of the incident will be added to the tenant’s electronic file.

- 5.2.1.2. If the individual attempts to re-access CHC in the future, the application will be reviewed and considered by the VP of Customer Experience.
- 5.2.2. In cases where a tenant or applicant threatens, or acts in a threatening manner towards CHC staff, the staff member(s) is to call 911 immediately and the Leader in Charge will activate the Threat Assessment Team where deemed appropriate.
  - 5.2.2.1. If the threat is from a tenant, a 24-hour notice of tenancy termination as per the Residential Tenancy Agreement may be issued.
  - 5.2.2.2. If the threat is from an applicant, CHC Leader(s) will work with Corporate Security to complete a risk assessment and determine appropriate actions which may include a short- or long-term ban from the workplace and suspension or removal from CHC's waiting list.
- 5.2.3. In the event of an act of violence or threat of violence at a District Office, the Duress Alarm will be activated, and the Duress Alarm Procedure will be followed.

### 5.3. Staff Non-Compliance

- 5.3.1. Staff failing to adhere to the items contained in this policy, including completing hazard assessments and fulfilling reporting requirements, will be subject to appropriate disciplinary action.

## 6. Reporting Incidences

- 6.1. Staff must report all incidents of unacceptable behaviours to their Leader and input them into SDMS within 24 business hours. Incidents of Workplace Violence will automatically be copied to Corporate Security.
  - 6.1.1. Considerations for reporting may differ based on individual employee's perception of an incident; additional guidance for reporting includes any unacceptable behaviour or warning signs of physical or psychological risk that any reasonable person would consider potentially injurious to themselves, their co-workers or others.
- 6.2. In incidences of workplace violence, Leaders are responsible for the following:
  - 6.2.1. Seeking advice or consultation on how the situation may be resolved (e.g. mediation, formal investigation).
  - 6.2.2. Implementing recommended actions to help resolve the situation and assist in preventing further occurrences.
  - 6.2.3. Consulting, referring, involving or cooperating with other City or external resources that may assist with the incident or provide support to the employee(s) (e.g. EFAP, safety, and police).
  - 6.2.4. Working with applicable unions and associations to develop and implement procedures to deter or limit the risk of violence in the workplace.



## 7. Debrief and Supports

7.1. Any staff member(s) impacted by aggressive behaviours or a victim of workplace violence will be encouraged to consult with a health professional. Services are available from the City's Employee & Family Assistance Program (EFAP), including Critical Management Services as well as the Peer Support Program.

7.2. Following an incident of unacceptable behaviour, the Leader or direct Supervisor will meet with and de-brief with the impacted staff member(s) within 24 hours.

7.2.1. If an incident occurred on the last day before the weekend or time away, the Supervisor will check in with the employee before the end of the shift of the last working day before the weekend or time away and schedule the de-brief on the employees first day back in the office following the weekend, or time away.

## 8. Corporate Security

8.1. All incidents of workplace violence must be reported to Corporate Security.

8.2. Corporate Security will triage and facilitate the investigation of all reported cases of workplace violence using an Investigation Matrix.

8.3. Corporate Security *may* activate the **Threat Assessment Team (TAT)** to help coordinate the response. TAT consists of the following member representatives:

- TAT Coordinator
- Corporate Security
- Human Resources
- Management from affected business unit(s)

Additional members may consist of representatives from:

- Police
- Safety Management
- Unions or associations
- Other professions (e.g. Psychologist, lawyer, communications)

When activated, TAT is responsible for the following:

8.4.1 Meeting and planning a response to a workplace violence situation where there is a potential risk of escalating violence;

8.4.2 Deciding if/when to intervene in a workplace violence situation;

8.4.3 Reviewing any available, relevant information about the incident;

8.4.4 Reviewing requirements for enhanced security of staff and assets;

- 8.4.5 Assisting with messaging to the victim and others in the organization;
- 8.4.6 Referring staff member(s) to applicable resources for obtaining court orders (e.g. restraining orders);
- 8.4.7 Issuing Trespass Notifications, if applicable;
- 8.4.8 Consulting and providing advice and/or direction on dealing with concerns and incidents of workplace and domestic violence, where appropriate;
- 8.4.9 Assisting with other issues that may arise;

## SUPPORTING REFERENCES AND RESOURCES

### Other references and resources

- The City of Calgary Workplace Violence Intranet [Site](#)
- The City of Calgary Workplace Violence [Policy](#)
- The City of Calgary Workplace Violence [Procedures](#)
- The City of Calgary Respectful Workplace [Policy](#)
- CHC Working Alone [Policy](#)
- CHC New Employee Safety Orientation [Procedure](#)
- CHC Duress Alarm [Procedure](#)
- CHC Trespass Notice [Procedure](#)
- CHC Suspension [Policy](#)
- CHC Threatening Messages Procedure (under development)
- Employee Family Assistance [Program](#)
- Emergency Information for [Employees](#) (includes what to do in an act of violence)
- Residential Tenancy [Act](#)
- City of Calgary [Employee & Family Assistance Program](#)
- [Calgary Housing Company Peer Support Network](#)
- [Occupational Health and Safety Act](#)

## REVISION HISTORY

Creation Date	Review Date	Description
August 2017	October 2022	- Refreshed language in the Policy and aligned it with new procedures and policies that were implemented since the original creation date

		<ul style="list-style-type: none"><li>- Added greater clarity on response and non-compliance consequences for unacceptable behaviours from Applicants.</li></ul>
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