



Where ideas work

MULTI-MINISTRY WORKSITES RECOMMENDED BEST PRACTICES

for

INTEGRATED RESTRICTED CLIENT ALTERNATIVE SERVICE DELIVERY PROCEDURES, APPEALS, RE-EVALUATION

and

NOTIFICATION TO FELLOW BUILDING TENANTS

*To complement your ministry
Prevention of Violence Office Plan*

Developed by:

Integrated (Personnel) Security Guidelines
for Multiple Ministry Worksites Working Group

November 05 2012

Table of Contents

Introduction	3
Purpose.....	4
Process	4
Procedures.....	4-9
APPENDIX A Sample Warning Letter to Client.....	10
APPENDIX B Conditions of Service Letter to Client	112
APPENDIX D Request for Review	13
APPENDIX E Continuation of Conditions of Service.....	14
APPENDIX F Potential Targeted Threat.....	15

Introduction

It was recognized that locations throughout the province housing multiple ministries needed assistance in managing clients who behaved inappropriately and in communicating information about the risk of violence these clients could present to other ministries and organisations sharing the same location.

In the past some ministries found it necessary to restrict services to clients who acted inappropriately to their staff and now more ministries are starting to adopt this practice. There had been no protocol established and communication between the tenants (including non-government businesses at some sites) was challenging when trying to manage a client that had received service restrictions due to their behaviour, their potential for violence, and the possibility of spill-over violence to co-located ministries. There have been cases identified where the restricted client has attempted to access the ministry via another tenant at the same location. Additionally it is necessary to ensure that the client can still access services from other ministries as required even though services have been restricted by one ministry at the location.

With an increase in the number of ministries sharing buildings (and door fronts and counter space at some locations) it is important to ensure that each co-located ministry has the appropriate information to maintain the safety of their employees.

This set of best practices was developed to address all of these deficiencies.

Employees with a diverse range of expertise from various ministries came together as a working group to develop this document:

- Richard Golob, Occupational Safety Specialist and Targeted Threat of Violence Program Coordinator, BC Public Service Agency
- Peter Lee, Regional Director, Citizens' Services and Open Government
- Bruce Luesley, Occupational Safety Specialist, BC Public Service Agency
- Betty-Ann Atherton, Director, Security and Corporate Risk, Ministry of Justice
- Gina Burroughs, Government Agent, Citizens' Services and Open Government
- Martina Mangion, Manager, Occupational Health and Safety, Ministry of Social Development
- Marny Williams, Regional Occupational Safety and Health Coordinator, Ministry of Children and Family Development
- David Foxall, Risk Mitigation Consultant, Government Security Office
- Shaun Fynes, Chief Security Officer, Government Security Office
- Marie Moore, Government Agent, Citizens' Services and Open Government
- Ron Hinshaw, Executive Director, Citizens' Services and Open Government

[Back to Table of Contents](#)

Purpose

To provide consistent, recommended, government-wide practice, at multi-ministry locations for:

- a) Accessing, determining and applying corrective measures for warnings or restrictions of service to clients as a result of their negative actions.
- b) Notifying fellow ministry and non-ministry tenants in the building about clients who have had a warning or have been restricted from entering the premises initiated either by the ministry or by a court order.
- c) Ensuring that there is a process for restricting a client from accessing services from non-affected ministries at the same location.
- d) Warning other building tenants about a client who poses an imminent threat.

Process

If there is a Court Order implemented that restricts the client from access to the building a recommended best practise of informing fellow tenants is identified in [Step 4](#). If no Court Order, then there is a need to assess client action(s) and determine appropriate level of corrective measure(s), which can range from verbal warning to client's restriction of service from in-person and/or phone access to ministry. This process requires consultation with the ministry's Safety Representative or equivalent (if you have one), local JOSH Committee (or Worker Safety Rep if no Committee) and/or a BCPSA Occupational Safety Specialist. The examples below are not meant to be exhaustive.

Procedures

If there is a Court Order implemented, skip this section and go to [Step 2](#).

Step 1 - Level of Behaviour

There are four recommended incident categories. Determine which category the incident falls under:

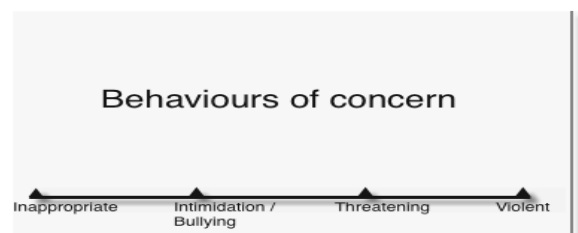
1. Inappropriateness

- Excessive swearing
- Horseplay in waiting room
- Verbal abuse (yelling, swearing, etc.)
- Intoxication

2. Intimidating/Bullying

- Harassing staff
- Excessive verbal abuse
- Refusal to leave building when asked
- Bullying or intimidating other clients
- Physical intimidation (shaking fist, pounding on counter, etc)

3. Threatening



[Back to Table of Contents](#)

- Uttering threats to staff/ family
- Threatening to spit
- Death threats
- Threatening to damage property
- Stalking

4. Violence

- Physical violence towards staff
- Client to Client Physical Violence
- Spitting on staff
- Damaging property
- Brandishing a weapon
- Throwing objects

Please Note:

- For immediate response procedures – refer to your ministry’s Violence Prevention Plan
- For potential Targeted Threat of Violence refer to [Appendix F](#).

Step 2 - Determine Corrective Measures

Types of corrective measures range from:

- Staff verbally warning client of inappropriate behaviour
- Supervisor verbally warning client of inappropriate behaviour
- Client provided with a written warning letter from supervisor ([Appendix A](#))
- Client provided with a conditions of service letter from attending and/or phoning the ministry office. Letter to be from a ministry representative, which should be a supervisor or higher.
[Appendix B](#)

Please Note:

- Please ensure all incidents/accidents are reported on a General Incident or Loss Report.
- If your ministry has its own internal reporting system, please ensure you utilise that system as well.

Step 3 - Record Client’s Condition of Service information

It is recommended that all Client’s Condition of Service be reviewed every six months in consultation with your Ministry Safety Representative or equivalent (if you have one), local OHS Committee (or Worker Safety Rep if no Committee) and/or a BCPSA Occupational Safety Specialist.

[Back to Table of Contents](#)

Step 4 - Notification to Fellow Ministry and Non-Ministry Tenants of a Client's Warning, Condition of Service, or Court Ordered Restrictions of Access to Building.

When a client has received a condition of service and is no longer permitted to access the ministry's office for services either through a ministry initiated restriction or through the BC Courts (i.e. Restraining Order) it is important to notify the other co-located organisations in the building for the following reasons:

1. Client may require services from the other organisations and arrangements will need to be made. It is important to collaborate with an open dialogue to ensure an effective process is in place to meet the needs of the condition, while at the same time enable the client to receive other services.
2. Ministry initiated condition - if the ministry who initiated the condition and the other service provider(s) are not sharing the same entrance, then the other service could be done on site depending on circumstances of condition, with the caveat that the client does not enter or try to contact the ministry that initiated the condition. **This needs to be done in consultation with the ministry who initiated the conditions of service.**
3. Court Ordered restrictions - alternative services delivery will have to be arranged.
4. If condition relates to a threat of harm to others by the client - the level of potential risk and mitigation strategies needs to be shared with those who may be affected by the client being on site. This will allow them the option to implement similar mitigation strategies if deemed warranted. Refer the recipients to the [Recognising the Potential for a Targeted Threat of Violence in the Workplace](#).

For an effective communication process, the following steps should be followed:

1. The ministry office that is initiating the communication should have one person appointed as the lead communicator. This person should be a management designate or the internal safety representative (if your ministry has one). This is necessary to coordinate information flow and decision making.
2. Each co-located organisation should have a predetermined point of contact. If there is already a co-located committee established, such as an Operational Management Committee (OMC), then contacts will default to these representatives.
3. All notifications will be initiated via e-mail (it is suggested that all notifications be followed up with a verbal confirmation as time permits).
4. Subject line should read: "Important- Restriction of Service to a Client" and the email tagged "High Importance".
5. The content of the e-mail should read "Please see attached".
6. Fill out the template and check off which of the three it pertains to [Appendix C](#):
 - a) Ministry Implemented Restriction – also attach a copy of the restriction letter
 - b) Court Ordered Restriction
 - c) Concern about harm to others by the client (Targeted Threat)
7. On all e-mails there must be a contact person for the recipients to contact for any questions or concerns they may have.

[Back to Table of Contents](#)

Step 5 - Reviewing Client's Conditions of Service

Determine rescinding of conditions.

Circumstances

- Client requests review (Request for Review of Conditions of Service [Appendix D](#))
- Supervisor review (based on timeframe)
- Advocate/third party requests review

Review Process

Request is forwarded to Supervisor and JOHS Committee. The following information must be reviewed:

1. Targeted Threat of Violence Assessment

- a) If information from a previously-conducted assessment was used in making the decision to restrict services to the client contact the assessors and request a reassessment based on updated information.

2. Review History

- a) Review dates of historic problematic behaviours (refer to hard file, incident reporting process, and previous targeted threat of violence assessments (if applicable).
- b) Review emotional affects of staff of the previous incident(s) (how they felt, was EFAP or individual or group stress debriefing utilized, how was incident(s) managed, etc)
- c) Review other relevant information as deemed appropriate.

3. Review Current Behaviours

- a) Discuss any new information of client's behaviour or interactions in the community:
 - i. Incidents in the community?
 - ii. Inappropriate contact with workers outside of work hours?
 - iii. Does client frequent local resources, consult with Agency Workers?
- b) Advocate/Third Party information (If applicable)
- c) Has Client accepted responsibility and acknowledgement of actions
- d) Changes in clients behaviour since conditions of service implemented
- e) Contact co-located organisations to see if they have any recent incidents of concern with client

4. Review with Staff Implications of Rescinding Conditions of Service

- a) Ensure discussion with all staff for feedback regarding review of client and possible reintegration. Discussion must include affects of client's behaviour/actions on staff, how they felt and how they feel now if client was reintegrated for face to face service.

5. Consultation with OSH Professional and Manager

- a) If MCFD office – consult with OHS Advisor

- b) If MSD office – consult with Workplace Health Advisor and/or Manager of Organizational Health and Development
- c) For all other ministries - if you do not have a designated Safety or Security Professional, consult with [BCPSA OS Specialist](#) by calling MyHR @ 1-877-277-0772
- d) Local law enforcement (if applicable)
- e) [Court Services On Line](#) for any new history in the BC Courts

If after reviewing Steps 1-4 the client's conditions of service are not rescinded, please refer to Step 7 below.

6. Discuss reintegration and impacts

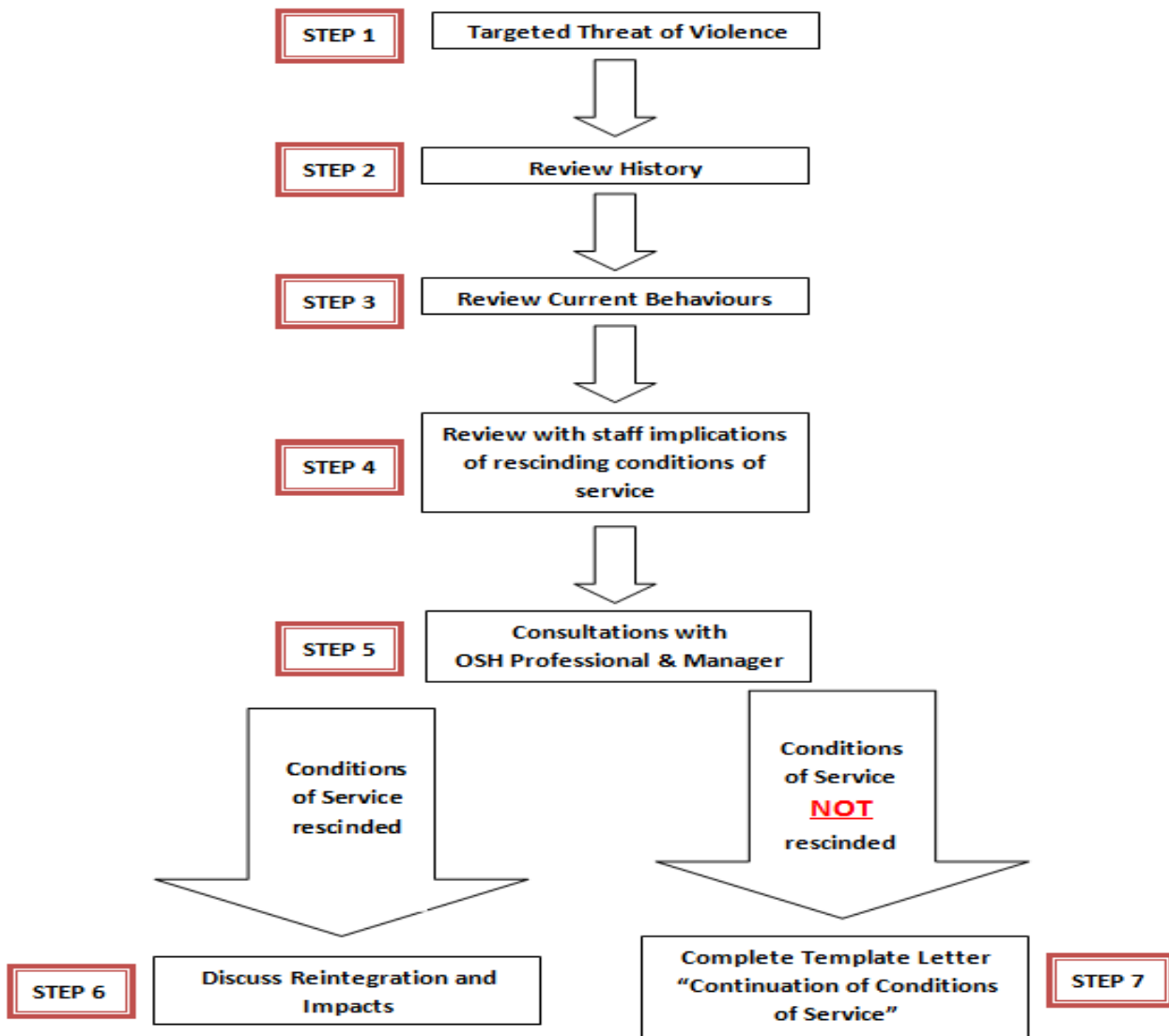
- a) Develop reintegration plan
 - i. Communication to client (possible probationary period, expectations, limitations, consequences if behaviour unacceptable, etc)
 - ii. Communication to staff and co-located organisations informing them of removal of restrictions
 - iii. Ensure Violence Prevention Plan is up to date
 - iv. Discuss worker safety and response procedures
- b) Complete Template Letter "Rescinding Conditions of Service" including justification from Steps 1-4

7. Complete Template Letter "Continuation of Conditions of Service" including justification from Steps 1-4 ([Appendix E](#))

See [Appendix D](#) – Request for Review of Conditions of Service.

[Back to Table of Contents](#)

Flow Chart for STEP 5: Reviewing Conditions of Service



[Back to Table of Contents](#)

APPENDIX A

Sample Warning Letter to Client

Date

File

Client Name

The Province of British Columbia is committed to providing safe workplaces where staff and clients are treated with courtesy, dignity, and respect.

This letter is a formal warning. Your inappropriate behavior on *(describe when, where, and what behavior took place)* is not acceptable. Any further inappropriate behavior will result in the loss of direct contact with the ministry and you will be provided with alternative conditions of service.

Sincerely,

Supervisor (It is recommended that a proper signature be used and that it be actioned at an appropriately high level)
Ministry...

[Back to Table of Contents](#)

APPENDIX B

Conditions of Service Letter to Client

Date

File

Client Name

The Province of British Columbia is committed to providing safe workplaces where staff and clients are treated with courtesy, dignity, and respect. Due to your inappropriate behaviour on *(describe when, where, and what behaviour took place and include reference to any relevant previous restrictions)*, conditions will be placed on how service is provided to you by the Ministry.

Effective immediately the follow Conditions of Service will be provided to you:

1. Phone Service Only – *(Ministry to describe the service)*
(e.g. - Any communication to our offices will be through our toll free number 1-866-866-0800 during the hours of 8:30 am and 4:30 pm, Monday to Friday)
2. Ministry Specific – You are not permitted to telephone or enter any ministry office *(ministry to describe service)*
(e.g. – When service is required you must acquire a person of legal age who can represent you to act on your behalf and you will be required to sign the Release of Information form attached and have this person submit the completed form to our office. This document allows the Ministry to provide information to your representative).

If you present yourself to any ministry office, you will be asked to leave. If you refuse, the Authorities will be contacted.

The ministry will initiate a review of your service restriction *(ministry to select one of the three options below)*:

1. in six months time and may contact you to request further information at that time. The decision will be communicated to you in writing. However, should you wish to request a review of this decision at any time, please communicate with the ministry via the method outlined above and provide reasons for your request.
2. when your no-contact order expires. The decision will be communicated to you in writing.
3. when your probation order expires. The decision will be communicated to you in writing.

Sincerely,

Supervisor
Ministry...

[Back to Table of Contents](#)

APPENDIX C

Access Restriction

ALERT – Access Restriction

*****Do not post in public view*****

*****Do not distribute to others*****

CLIENT NAME: (Enter Name Here)

CLIENT DESCRIPTION (gender, eye colour, hair colour, height, facial hair):

If a picture is available, it should only be provided to persons who need to know and not placed where it would be visible to clients/public.

TYPE OF ALERT:

(Ministry Implemented, Court or Probation Order, or Targeted Threat of Violence)

AFFECTED OFFICE ADDRESS(ES):

REASON (select one box below and delete the rest):

Due to **unacceptable behaviour** and failure to abide by previous warnings, the client has had restrictions to services implemented, effective (enter date). Copy of the restriction letter attached.

Due to a **court or probation order**, the client is restricted from entering the building, effective (enter date). **If client breaches order call 911**

Due to the **potential that this client may do harm to others**, he/she has had restrictions to services implemented, effective (enter date).

MITIGATION STRATEGIES IMPLEMENTED (bullet form):

RESTRICTIONS IMPLEMENTED (bullet form):

- Phone Service Only
- Advocate Only

You will be notified when restrictions are removed.

If you have any questions, please contact (manager's name).

**This ALERT is posted in accordance with:
WorkSafeBC OH&S Reg. 4.30 & Workers Compensation Act sec. 115(2) (b) (i)**

APPENDIX D

Request for Review



Request for Review of Conditions of Service

Section 1 Client information

<i>Date:</i>	<i>File #:</i>
<i>Name:</i>	<i>Phone:</i>
<i>Address:</i>	

<i>Advocate's Name:*</i>	<i>Phone:*</i>
--------------------------	----------------

Section 2 Reason for Request (to be completed by the requestor)

Attach additional pages as required

Client or advocate can attach any other documentation supporting their request.

CLIENT DECLARATION AND CONSENT – MUST BE READ, SIGNED AND DATED

(Do not change text of authorization below)

- I hereby certify that the information given in this application and in any documentation attached to or forming part of this application is true and complete.
- I consent to the verification and exchange of information with public authorities, agencies and persons, as appropriate, for the purposes of administering the *Request for Review of Conditions of Service*. (a list of the public authorities, agencies and persons can be provided by request of the undersigned)
- I understand that my information will be protected in accordance with the *British Columbia Freedom of Information and Protection of Privacy Act*.
- This consent is effective on signature until completion of review

Please check this box if someone has Power of Attorney or another legal representation agreement and is signing on your behalf; include a copy of the agreement with this application.

SIGNATURE: _____

DATE SIGNED: _____

Ministry Representative's Signature: _____

Date Signed: _____

Attached: copy of *Conditions of Service* letter * Include if applicable

A photocopy or fax of this completed form is as valid as the original.

APPENDIX E

Continuation of Conditions of Service

Date

Client address

Dear

This letter is to inform you that the *<insert responsible ministry>* has reviewed your current restriction of service from this ministry.

The restrictions set out for you in the Conditions of Service letter (copy attached) dated *<insert date of letter>* will remain in effect.

You may apply for a another review of the conditions of service that are currently in effect if your circumstances change.

Sincerely,

DRAFT

APPENDIX F

Potential Targeted Threat

**GUIDE FOR CO-LOCATED
(MULTI) MINISTRIES
WORKPLACES
ON RECOGNISING
THE POTENTIAL
FOR A TARGETED
THREAT OF VIOLENCE
IN THE WORKPLACE**

Developed by:

Integrated (Personnel) Security
Guidelines for Multiple Ministry Worksites
Working Group

TARGETED THREATS OF VIOLENCE FOR MULTI-MINISTRY LOCATIONS

There may be times that you and your workplace are faced with a possible targeted threat of violence. This threat may come to your attention through: a co-located office or by an employee who has just dealt with a threatening or concerning client.

This guide is intended to assist the manager/supervisor:

- identify individuals who may pose a risk of a targeted threat of violence in the workplace
- recommend appropriate actions

While it is impossible to accurately predict whether or not a person will commit a planned or premeditated act of violence, the presence of warning signs can alert us to an increased risk. It's important to note that not everyone who exhibits these warning signs will become violent. Statistically very few people pursue targeted violence.

Research into incidents of workplace violence has shown that the potentially violent person exhibits characteristics or signs prior to a violent act. Understanding these signs, recognizing when they occur and acting on this knowledge and recognition are vital steps in mitigating a potentially serious situation.

The following pages provide identifiers for possible targeted threats of violence for both internal and external threats, and provide guidance in how you can assist in the management of the targeted threat.

Background

The BC Public Service Agency (BCPSA) and the Government Security Office, within Risk Management Branch, (GSO) have developed a comprehensive program to manage Threats of Targeted Violence in BC Public Service workplaces. This program was endorsed by the Deputy Ministers' Council in 2010. This document is a component of the overall program to assist Ministries that are co-located.

Definitions

As it pertains to this document:

- **Targeted Threat:** means any planned act, or expression of intent to plan to inflict physical or other harm against a person or a workplace. A threat can be spoken, written or symbolic.
- **Co-Located (Multi) Ministries:** where two or more BC Public service organizations share common space or facility.
- **Internal Threat:** Targeted threat from an employee(s) or contractor of the BC Public Service

- **External Threat:** Targeted threat from non-BC Public Service employee(s) e.g.: tax payer, ex-employee, external client, unknown, domestic spill-over.
- **Domestic Spill Over:** Targeted threat to a BC Public Service employee from a spouse/ex-spouse or family member that has the potential of taking place at the employee's workplace causing harm to the employee or others in the workplace.
- **Imminent:** About to happen – anticipate it will occur soon
- **Assessment:** The collection and review of information to determine the level and nature of threat posed by an individual or group.
- **Subject:** Person posing or making the threat.
- **Target:** Person(s) or office identified as at risk as a result of the threat

EXTERNAL THREAT

External threats can come in a number of forms and from a diversity of persons. It could be a disgruntled client who is unhappy with how a file is being handled and feels s/he is being unfairly treated, a group that does not agree with how the government is managing a particular issue, a domestic spill over, or a mentally unstable person who targets the BC Public Service. In our experience to date, the most common of the four is the person who feels unfairly treated. In the case of co-located offices the subject may be upset with another office; however, the threat poses a collateral risk.

Examples of an external targeted threat:

- Verbal or written threat to physically harm an employee(s) or others within the BC Public Service
- Verbal or written threat to set explosives, cause fire or through other harmful/damaging means to BC Public Service employees and worksite(s)
- An employee's domestic partner / ex-partner, significant other or family member has threatened to do harm to the employee, which may result in domestic spill over at the workplace
- The client's actions either now or historically cause staff in the workplace to be fearful that s/he poses a threat of harm

Refer to this [link](#) for suggested actions for Targeted Threats of Violence.

IF A THREAT APPEARS IMMINENT CALL 911 IMMEDIATELY

INTERNAL THREAT

As with external threats, internal threats can come in a number of forms. It could be a disgruntled employee who is:

- unhappy with work environment or the actions of the supervisor or co-worker(s)
- in disagreement with a disciplinary process against her/him
- suffering from a mental illness and chooses to target the workplace

For more on assessing internal threats, please refer to the [Managers/Supervisors Guide to Recognizing Targeted Threats of Violence in the Workplace](#)

Examples of Warning Signs

Direct:
<p>The following warning indicators <u>may signal a potential risk of violence</u>:</p> <ul style="list-style-type: none"><input type="checkbox"/> Previous direct (<i>I am going to shoot John Doe</i>) or indirect (<i>someone needs to shoot John Doe</i>) threats of harm to Ministry staff or others<input type="checkbox"/> Subject's inappropriate behaviour has escalated over time to the point where s/he is causing fear in the workplace<input type="checkbox"/> Subject has an interest in people who use violence to solve problems (e.g. Columbine shooters, Marc LePine (Montreal Polytechnique), Virginia Tech)<input type="checkbox"/> Subject's indications of desperation to the point of discussion and/or threats to harm others and/or self<input type="checkbox"/> Subject carries a weapon or indicates access to weapons<input type="checkbox"/> Employee's intuition (gut feeling) makes the employee feel particularly uncomfortable or fearful of a client <p style="text-align: center;">IF A THREAT APPEARS IMMINENT CALL 911 IMMEDIATELY</p> <p>Immediately contact your Supervisor/Manager for advice and guidance. If not available then contact the BCPSA Regional OS Specialist through MyHR at 1-877-277-0772.</p> <p>Note: If your ministry has an internal OS Advisor, then s/he should be contacted as well.</p>

Suggested Actions for Employees

If you believe there is a risk of targeted violence then discuss the situation with your supervisor/manager. It is important to only involve those persons necessary to assist in the analysis, mitigation and management of the threat. Too many persons becoming involved in a communication chain may hinder an effective assessment.

IF A THREAT APPEARS IMMINENT CALL 911 IMMEDIATELY

Suggested Actions for Supervisors and Managers

Key persons to involve:

- Your Ministry Security Officer
- Your Ministry OSH Advisor (if you have one) or the applicable [BC PSA Regional Occupational Safety \(OS\) Specialists](#)
- Co-located ministries or organization's Managers (as applicable)
- Contact your Regional Executive Director or equivalent in accordance with your ministry's policies

Your OSH Advisor/BCPSA OS Specialist will contact the Targeted Threat of Violence Management Program, who will determine the level of threat and make recommendations on mitigation strategies.

Note: The basics of threat management are to take “early and certain action,” therefore when issues arise, especially those with indicators of a potential threat of targeted violence, they must be addressed immediately. If a response to potential violence issues is cursory or delayed, it can wrongly give an impression that these behaviours are acceptable and allow the problem to continue. Aggressive or violent behaviour is unacceptable at all times.

Questions

If you have any questions pertaining to targeted threats of violence, please contact your regional [BCPSA OS Specialist](#) or your Ministry OSH Advisor (if you have one).

Feedback

Broadly available assessment and management of targeted threats of violence is a recently developed process within Canada. Given the paramount importance of personnel safety, we are pleased that BCPSA and Risk Management Branch embraced these practices and together have adopted a leadership role to protect staff.

In conducting and managing threat assessments, the manager/supervisor is an essential player by helping the ministry ensure the safety of staff.

We welcome suggestions you may have to improve this document or make it more user- friendly. Please send to governmentsecurityoffice@gov.bc.ca.

We thank you for your support and participation.