

# Workplace Violence Prevention - Compliance Gap Analysis

A TEMPLATE FOR K-12 PUBLIC EDUCATION - COMPLIANCE

The implementation of this tool is not mandatory. The tool contains recommendations to support workplace violence prevention and regulatory compliance. The information presented can be adopted in whole, in part, or not at all.

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## K-12 Public Education Sector Workplace Violence Prevention - Gap Analysis Tool

### Instructions

- 1 Use this gap analysis to compare your existing workplace violence prevention process to some of the core requirements within the applicable Act and Regulation.
- 2 Review the Section Description column, the Audit Question, and finally the Evidence to consider column.
- 3 Determine if you have met the requirement or if there is more information needed and enter the appropriate score.
- 4 Enter comments about your findings in the space provided. Be specific about what documents were reviewed, what versions, and the line item or page that meets that requirement.
- 5 Review the Result Summary Tab to quickly see which areas are well established and which area to target for improvement.
- 6 Make action plans to reduce the gap between where you are today and meeting the requirements.

Item #	Reg. Sec	Section Description	Section	Audit Question	Evidence to consider	5 - Meets or Exceeds 3 - Mostly Meets 1 - Partially Meets 0 - Does Not Exist or Meet	Findings
1	<a href="#">4.28</a>	<b>Risk assessment</b> (1) A risk assessment must be performed in any workplace in which a risk of injury to workers from violence arising out of their employment may be present. (2) The risk assessment must include the consideration of  (a) previous experience in that workplace,  (b) occupational experience in similar workplaces, and  (c) the location and circumstances in which work will take place.	4.28(1)	Has a risk assessment been performed in all School District workplaces in which a risk of injury to workers from violence arising out of their employment may be present?	Review workplace violence risk assessments that demonstrate that the school district has reviewed the risk of workplace violence at each worksite. Evidence of a completed workplace violence risk assessment could be found in one over arching document for a site or through the use of a few documents and tools.  There should be the same number of risk assessments for a schoold district as there are sites. The risk assessment should include all school district workplaces and all categories of workplace violence.  The risk assessment information and process should help identify where there is increased potential risk of injury from workplace violence.  Although there could be common information in the risk assessments each risk assessment should have unique information specific to that location.  WSBC Sample: <a href="https://www.worksafebc.com/en/resources/health-safety/information-sheets/steps-for-conducting-a-violence-risk-">https://www.worksafebc.com/en/resources/health-safety/information-sheets/steps-for-conducting-a-violence-risk-</a>	5	
2	<a href="#">4.28</a>		4.28(2)a	Do(es) the completed risk assessment(s) include the consideration of previous experiences of workplace violence at the worksite?	Review the risk assessment information to ensure that historical information on violence in the workplace related to the site identified in the risk assessment has been considered. The following should be consider as historical information: - the last twelve (12) months of first aid reports, and incident investigation reports from the site.  Review if the risk assessment has including an analysis of trends with respect to any of the following: locations, numbers of incidents, nature of the incident, severity, duration, frequency, intensity, impact to workers, worker role, worker experience.  Each district or site might collect different information related to violent incidents and the investigations therefore the items above are suggestions.	1	

Filter for sections and use the hyperlinks to go to WSBC guidelines.

#2 Rate your evidence by entering the appropriate

#3 Enter finding text

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1	4.28	4.28(1)	<b>Risk assessment</b> (1) A risk assessment must be performed in any workplace in which a risk of injury to workers from violence arising out of their employment may be present.	Has a risk assessment been performed in all School District workplaces in which a risk of injury to workers from violence arising out of their employment may be present?	Review workplace violence risk assessments that demonstrate that the school district has reviewed the risk of workplace violence at each worksite. Evidence of a completed workplace violence risk assessment could be found in one over arching document for a site or through the use of a few documents and tools. An individual risk assessment is required for each site in the district. The risk assessment should include all school district workplaces and all types of workplace violence. The risk assessment information and process should help identify where there is increased potential risk of injury from workplace violence. Although there could be common information in the risk assessments, each site's risk assessment should also have unique information specific to that location. WSBC Sample: <a href="https://www.worksafefbc.com/en/resources/health-safety/information-sheets/steps-for-conducting-a-violence-risk-assessment?lang=en">https://www.worksafefbc.com/en/resources/health-safety/information-sheets/steps-for-conducting-a-violence-risk-assessment?lang=en</a>	Workplace violence Risk Assessment Template		
2	4.28	4.28(2)a	(2) The risk assessment must include the consideration of  (a) previous experience in that workplace,	Do(es) the completed risk assessment(s) include the consideration of previous experiences of workplace violence at the worksite?	Review the risk assessment information to ensure that historical information on violence in the workplace related to the site identified in the risk assessment has been considered. The following should be consider as historical information: - at least the last twelve (12) months of first aid reports, and incident investigation reports from the site related to workplace violence. Review if the risk assessment has included an analysis of trends of qualitative data and quantitative data. Consider the following: locations, numbers of incidents, nature of the incident, severity, duration, frequency, intensity, impact to workers, worker role, worker experience. Each district or site might collect different information related to violent incidents and investigations therefore the items above are suggestions.	Workplace violence Risk Assessment Template		
3	4.28	4.28(2)b	(b) occupational experience in similar workplaces, and	Have the school district's workplace violence risk assessments taken into consideration the experience of workplace violence of similar workplaces in the K-12 public education sector?	Review if the risk assessment considers experiences in workplace violence and controls from similar workplaces in the sector (district wide, secondary versus secondary, or compare other district information, consider the control tools in Violence Prevention Workinggroup offering). Consider if types of workplaces (locations) or types of work (circumstances) have been included in this report. Examples could include: - Educational Assistants, Teachers, Principals, Other employees groups, secondary schools, elementary schools Look if other sources of information have been considered, in particular in workplaces with low incidents of workplace violence. Review WSBC stats: <a href="https://public.tableau.com/profile/worksafefbc#1/vizhome/Time-lossclaimsinpublicschooldistricts/Didyouknow">https://public.tableau.com/profile/worksafefbc#1/vizhome/Time-lossclaimsinpublicschooldistricts/Didyouknow</a>			
4	4.28	4.28(2)c	(c) the location and circumstances in which work will take place.	Has the risk assessment included the location and circumstances in which work will take place?	Review the types of jobs and tasks as well as the locations that have been considered in the risk assessments. They should include but not be limited to: <b>School based:</b> Admin Assistant (Office reception), Administrator (Principal, vice Principal) Teachers (classroom and learning support, music, librarian, all), Itinerant employees, Educational Assistants, Councillors/psychologist/OT/PT, Cafeteria Staff, Custodian, Drivers, those working alone - as defined  <b>District based:</b> Office employees - all, Reception and others that interact with the public, Maintenance/Trades, Exempt staff  <b>Types of sites:</b> District Offices - including parking lots, schools - secondary - elementary - adult, Child care sites, specialty schools, including parking lots and outdoor grounds, maintenance shops, home offices, buses  <b>Home visits or Off site travel for work:</b> Home visits, Work experience facilitators, field trips, conference and meetings off site  Review the ratings of risk applied to each workplace or circumstance of work for the various roles. Risk ratings could include low medium and high. Review the listing or controls in place to minimize the risk.			

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5	<a href="#">4.28p</a>	4.28 - Performance		Has the site based JHSC been involved in the risk assessment process?	JHSC members should have reviewed the information found in the risk assessment at a meeting or been initially involved in the process if possible. Look for evidence of the risk assessment being communicated to or reviewed by the JHSC.			
6	<a href="#">4.28p</a>	4.28 - Performance		Was the input from affected workers taken into consideration during the risk assessment process?	Look for evidence that workers at risk of injury from workplace violence and supervisors have been involved in the risk assessment process or review. Review if their information was taken into consideration for what is working and what isn't working. The worker information could have been used to identify gaps. This information could be obtained via group discussions, interviews, or surveys.	Workplace Violence Worker Experience Survey		
7	<a href="#">4.28p</a>	4.28 - Performance		Was the person or team that completed the risk assessment knowledgeable about the workplace operations?	Consider years of service, experience, designation, training or education and a understanding of workplace violence as defined. Determine if there are specific requirements in the program about the qualifications of the risk assessor.	N/A		
8	<a href="#">4.28p</a>	4.28 - Performance		Do the procedures require a periodic review of the risk assessment and has the workplace violence risk assessment recently been reviewed?	The documented records should show that the risk assessment was reviewed within the last three (3) years, or after any significant incident that was not considered within the risk assessment.	N/A		
9	<a href="#">4.28p</a>	4.28 - Performance		Have there been significant changes to any school district buildings or activities offered (including new types of jobs) and has the risk assessment be reviewed since each change?	Compare and review the latest changes to buildings, or new schools, and portable classrooms. Look for changes to how spaces may be used that could have an impact on mitigation of workplace violence. Look for new specialized positions that do work that was not previously done by the district or school and that was not considered in previous risk assessments.	N/A		
10	<a href="#">4.29</a>	4.29(a)	<b>Procedures and policies</b> If a risk of injury to workers from violence is identified by an assessment performed under section 4.28 the employer must  (a) establish procedures, policies and work environment arrangements to eliminate the risk to workers from violence, and	Where the school district has identified a risk of violence to a worker, has it implemented policies, procedures, or work environment arrangements to eliminate the risk to workers from workplace violence?	Look for a detailed policy, or procedures that outlines the school district commitment to eliminating workplace violence. The hazard related to workplace violence is the person. In the K-12 sector it is not feasible to eliminate the hazard.			
11	<a href="#">4.29</a>	4.29(b)	(b) if elimination of the risk to workers is not possible, establish procedures, policies and work environment arrangements to minimize the risk to workers.	Are there policies, procedures and or work arrangements in place to protect workers in situations where workplace violence cannot be eliminated?	Look for documented information related to procedures or instructions, training and awareness for workers on actions or responses to reduce the risk of violence or to mitigate the risk of injury during a response to workplace violence. Minimizing the risk to workers might include (Listed in order of preference): <b>Engineering:</b> Physical barriers, securing doors, secure work areas, minimizing the number of entry points, <b>Administrative:</b> signs, monitoring cameras, panic alarms, communications protocols, individual safe work instructions (employee safety plans), Reviews of incidents, training and awareness, changing the way specific work is done, direct supervision <b>Personal protective equipment:</b> hats, protective glasses, smock/vest, arm protectors, gloves, pants, sturdy shoes, shin pads			
12	<a href="#">4.29p</a>	4.29 - Performance		Do the procedures, policies or work arrangements clearly define or include the definition of workplace violence?	Look for the definition of workplace violence as defined in the regulation to be explicitly included in some of the documentation and training materials.			
13	<a href="#">4.29p</a>	4.29 - Performance		Were the actions/recommendations from the risk assessment addressed in policies, procedures, and or work arrangements?	Review the risk assessment and any action plans. Determine if the required controls have been addressed in documents or practice.			
14	<a href="#">4.29p</a>	4.29 - Performance		Are there defined processes for assessing the risk of potential student dysregulation?	Look for documents or methods used to assess and document the behaviours expected during individual student dysregulation. This information could be expected to be found in the individual safe work instructions (employee safety plans), or possibly in positive behaviour support plans as well.			
15	<a href="#">4.29p</a>	4.29 - Performance		Are there defined processes for responding to incidents involving members of the public - known or unknown, including domestic violence?	Review documents and identify information related to managing situations where members of the public known and unknown, including parents or domestic partners of workers are dysregulated and engaging in confrontation with workers. Review the response plans for these types of incidents.			

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16	<a href="#">4.29p</a>	4.29 - Performance		Is there method for parents or guardians of new students to the district to communicate to the district information about social and emotional behaviour?	Review the school district registration forms. Determine if there is a method that allows parents or guardians to flag the registration form indicating further discussion is requested with respect to social and emotional behaviour.	Registration Form		
17	<a href="#">4.29p</a>	4.29 - Performance		Is there an established and communicated method for employees to evaluate the risk of violence before and during interactions with others?	Look for evidence of procedures, training, instruction, or promotional media for workers to conduct a pre work evaluation. This would be similar to conducting a scene assessment before initiating first aid.	Point of Contact Risk Assessment using PEET		
18	<a href="#">4.29p</a>	4.29 - Performance		Do educators have access to method to determine students at social and emotional risk?	Look for evidence of a standard practice and format for initiating the school based dialogue around behavioural concerns in the classroom.	Social, emotional acedemic behaviours risk screener		
19	<a href="#">4.29p</a>	4.29 - Performance		Does the district have a clear method to report incidents of workplace violence?	Look for evidence of an established and communicated workplace violence incident reporting system. In some cases this can be connected to or similar to reports of injury/illness forms. Forms for workplace violence should be initiated regardless of an injury.	Workplace violence incident report - and review		
20	<a href="#">4.29p</a>	4.29 - Performance		Does the district have a clear method to investigate incidents of workplace violence?	Incidents of workpalce violence that result in medical treatment or time loss are required to be investigated, as are incidents that could have led to a serious injury. Look for evidence of a investigation process that is consistent and looks at workplace violence to prevent further incidents as well as support workers and students.	Workplace violence incident report - and review		
21	<a href="#">4.29p</a>	4.29 - Performance		Does the district right to refuse unsafe work process include instances of workplace violence.	Look for evidence that the established right to refuse unsafe work process would be sufficient to cover most workplace violent occurrences.	Right to refuse unsafe work process flow		
22	<a href="#">4.29p</a>	4.29 - Performance		Is there a clear and established process for handling workplace violence related to student worrisome behaviour?	Look for the implementation of the Violence Threat Risk Assessment (VTRA) process for students displaying worrisome behaviour.	Violence Threat Risk Assessment (VTRA)		
23	<a href="#">4.30</a>	4.30(1)	<b>Instruction of workers</b> (1) An employer must inform workers who may be exposed to the risk of violence of the nature and extent of the risk.	Has the school district developed and administered training to workers who may be exposed to the risk of workplace violence?	Look for training information related to: - General awareness of workplace violence for all employees including the results of the workplace violence risk assessment, as well as the measures taken to minimize the risk of violence, and the nature and extent of violence including the likelihood the worker may be exposed to it. The appropriate measures to be taken if violence occurs or is threatened and informed about seeking medical attention in the event of physical or mental injury. Also consider specific training for: - Task specific awareness to workplace violence - targeted to specific roles or working with specific students. The training at various levels of affected workers could include dealing with frustrated parents, spouses or students and student worrisome behaviour and intruders. Workers must be informed of the risk prior to the start of their work. Workers and supervisors must be informed about the various duties under the act. Consider universally and inclusively designed learning environments, trauma informed practice, social and emotional learning, positive behaviour.			
24	<a href="#">4.30</a>	4.30(2)	(2) The duty to inform workers in subsection (1) includes a duty to provide information related to the risk of violence from persons who have a history of violent behaviour and whom workers are likely to encounter in the course of their work.	Has the school district established a clear means of informing workers about those they might encounter with a history of violent behaviour?	Review if the school district has an established method to inform affected employees of those with a history of violence prior to the worker's exposure to the risk. Processes could include, flagging documentation, team meetings, binders with information, TTOC folders.	ISWI		
25	<a href="#">4.30</a>	4.30(3)a	(3) The employer must instruct workers who may be exposed to the risk of violence in (a) the means for recognition of the potential for violence,	Has the school district informed workers who may be exposed to the risk of violence on how to recognize the potential risk of violence?	Look for evidence of workplace violence specific training and awareness around the recognition of risk of violence. This could include general awareness of what to look for, or be specific to an individual student signs of dysregulation. Consider all employee groups that might require this training - custodians, bus drivers, or central services and principal, all teachers, and educational assistants.	Point of Contact Risk Assessment using PEET		
26	<a href="#">4.30</a>	4.30(3)b	(b) the procedures, policies and work environment arrangements which have been developed to minimize or effectively control the risk to workers from violence,	Has the school district informed workers who may be exposed to the risk of violence on the procedures, policies, and work environment arrangements which have been developed to minimize or effectively control the risk to workers from violence?	Look for training information or records related to the communication of requirements and internal protocols to workers. This should be included in general workplace violence awareness level training as well as individual student level awareness.			

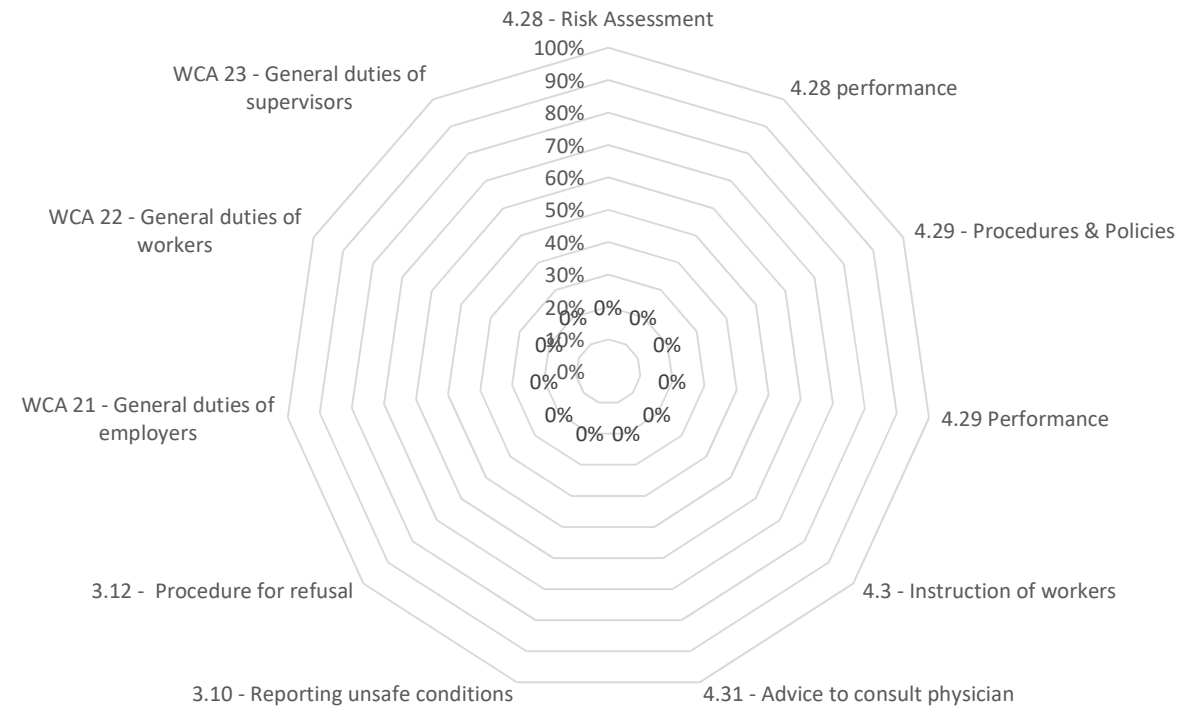
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27	<a href="#">4.30</a>	4.30(3)c	(c) the appropriate response to incidents of violence, including how to obtain assistance, and	Has the school district informed workers who may be exposed to the risk of violence on the appropriate response to incidents of violence, including how to obtain assistance?	Look for training information or records related to the communication of requirements for responding to various types of workplace violence events. It could include general items like bomb threats, external or internal threats, and for individual students it may include individualized crisis response plans. Look for clear procedures on what to do, how to announce an incident if necessary, and who responds to the call. Consider working alone or in isolation - what are the systems in place to ensure an appropriate response.			
28	<a href="#">4.30</a>	4.30(3)d	(d) procedures for reporting, investigating and documenting incidents of violence	Has the school district informed workers who may be exposed to the risk of violence on the procedures for reporting, investigating and documenting incidents of violence	Look for an implemented and established method for workers to use when informing the employer of a workplace violence incident as well as a process by which workplace violence incidents would be investigated when they meet the criteria.			
29	<a href="#">4.31</a>	4.31(3)	<b>Advice to consult physician</b> (3) The employer must ensure that a worker reporting an injury or adverse symptom as a result of an incident of violence is advised to consult a physician of the worker's choice for treatment or referral.	Do the school district policies, procedures or other work arrangements advise workers to consult a physician when the worker is injured or experiencing adverse symptoms as a result of an incident of workplace violence?	Review documentation and ensure that there is clarity with respect to workers being informed about the need go to seek medical attention if there is an injury - physical or psychological.			
30	<a href="#">3.10</a>	3.10.	<b>Reporting unsafe conditions</b> Whenever a person observes what appears to be an unsafe or harmful condition or act the person must report it as soon as possible to a supervisor or to the employer, and the person receiving the report must investigate the reported unsafe condition or act and must ensure that any necessary corrective action is taken without delay.	Do the school district policies, or procedures outline the requirement for reporting unsafe conditions?	Review documentation that clearly indicated the regulatory requirement for reporting unsafe conditions.			
31	<a href="#">3.12</a>	3.12(1)	<b>Procedure for refusal</b> (1) A person must not carry out or cause to be carried out any work process or operate or cause to be operated any tool, appliance or equipment if that person has reasonable cause to believe that to do so would create an undue hazard to the health and safety of any person.	Has the school district informed workers about the right to refuse unsafe work and the appropriate steps to take to follow that process?	Review documentation that includes information on the workers right to refuse unsafe work and the process to notify their supervisor immediately. The steps should be clearly documented for the process and specifically include information related to workplace violence.	Refusal of unsafe work process form		
32	<a href="#">WCA S21</a>	21(1) & 21(2)	<b>General duties of employers</b> (1) Every employer must  (a) ensure the health and safety of  (i) all workers working for that employer, and  (ii) any other workers present at a workplace at which that employer's work is being carried out, and  (b) comply with the OHS provisions, the regulations and any applicable orders.	Is the employer aware of their duties under the Act?	Review records of communication to the employer with respect to duties under the act. Including but not limited to: - remedy any workplace conditions that are hazardous to the health or safety of the employer's workers, - provide to the employer's workers the information, instruction, training and supervision necessary to ensure the health and safety of those workers in carrying out their work and to ensure the health and safety of other workers at the workplace. Check in with the employer about their awareness of their duties with respect to the Workers Compensation Act.			
33	<a href="#">WCA S22</a>	22(1) & 22(2)	<b>General duties of workers</b> (1) Every worker must  (a) take reasonable care to protect the worker's health and safety and the health and safety of other persons who may be affected by the worker's acts or omissions at work, and  (b) comply with the OHS provisions, the regulations and any applicable orders.	Are workers aware of their duties under the Act?	Review training records related to awareness of worker duties under the act. Including but not limited to: - a worker must carry out the worker's work in accordance with established safe work procedures as required by the OHS provisions and regulations. Check in with workers about their awareness of their carry out their duties in accordance to the safety work procedures as required by the Workers Compensation Act.			
34	<a href="#">WCA S23</a>	23(1) & 23(2)	<b>General duties of supervisors</b> (1) Every supervisor must  (a) ensure the health and safety of all workers under the direct supervision of the supervisor,  (b) be knowledgeable about the OHS provisions and those regulations applicable to the work being supervised, and  (c) comply with the OHS provisions, the regulations and any applicable orders.	Are supervisors aware of their duties under the Act?	Review training records related to awareness of supervisor duties under the act. Including but not limited to: - ensuring that workers are made aware of all known or reasonably foreseeable health or safety hazards in the area where they work. Check in with supervisors about their awareness of their duties carry out their duties in accordance to the safety work procedures as required by the Workers Compensation Act.			

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35	<a href="#">WCA 569</a>	69	(1) An employer must conduct a preliminary investigation under section 71 and a full investigation under section 72 respecting any accident or other incident that  (a) is required to be reported under section 68,  (b) resulted in injury to a worker requiring medical treatment,  (c) did not involve injury to a worker, or involved only minor injury not requiring medical treatment, but had a potential for causing serious injury to a worker, or  (d) was an incident required by regulation to be investigated.  (2) Subsection (1) does not apply in the case of a vehicle accident occurring on a public street or highway.	Does the school district have an established formalized method to investigate incidents and initiate a preliminary investigation as well as a complete investigation when the specific criterion has been met?	Look for a procedure, or training that has been conducted for supervisors and or employees with respect to the need for investigations to be completed.  Evidence also includes forms and records related to investigated incidents. Review if the forms are submitted to WSBC through the Employer Incident Investigation Report submission portal.			



### Workplace Violence Prevention Gap Analysis

Section	% Achieved	Points Achieved	Points Available
4.28 - Risk Assessment	0%	0	20
4.28 performance	0%	0	25
4.29 - Procedures & Policies	0%	0	10
4.29 Performance	0%	0	55
4.3 - Instruction of workers	0%	0	30
4.31 - Advice to consult physician	0%	0	5
3.10 - Reporting unsafe conditions	0%	0	5
3.12 - Procedure for refusal	0%	0	5
WCA 21 - General duties of employers	0%	0	5
WCA 22 - General duties of workers	0%	0	5
WCA 23 - General duties of supervisors	0%	0	5
WCA 69 - Incidents that must be investigated	0%	0	5



Review Completed by:

Date

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# Change log

Date	Section	Old text	Change	Updated	Updated Version Number
2021-12-17	Item #20	Does the district have a clear method to investigated incidents of workplace violence?	Replace "investigated" with "investigate"	Does the district have a clear method to investigate incidents of workplace violence?	1.1