



Saint Paul University

Violence Prevention Program

April 9, 2024

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Regulation

Saint Paul University has created a workplace violence prevention policy. Regulation RHR-224-b, *Prevention of Violence in the Workplace*, stipulates in particular that:

Saint Paul University recognizes the potential for violence in the workplace and is committed to working with staff members to provide a safe work environment. Saint Paul University is committed to preventing violence in the workplace and is ultimately responsible for the health and safety of staff members. It will take all reasonable steps to protect staff members from violence, regardless of its source.

Threats of violent behaviour by or against a member of the University are unacceptable conduct and will not be tolerated. Saint Paul University is committed to taking steps to prevent workplace violence and protect staff against any act of violence.

[...]

Responsibilities of Saint Paul University

[...]

8.10 Assess the risks of workplace violence that may arise from the nature of the workplace, the type of work or working conditions.

The most recent version of Regulation RHR-224-b, *Prevention of Violence in the Workplace*, is published on the University website as well as on the Workplace Health and Safety bulletin boards found throughout the campus.

Under the Ontario *Occupational Health and Safety Act*, employers are required to create and maintain an implementation program for their workplace violence policy. Programs must include:

- Measures to take and steps to follow to monitor risks that have been identified that could expose a staff member to physical injury;
- Measures that staff members should take and steps to follow to reports incidents of workplace

- violence to the employer or supervisor;
- Measures to take and steps to follow to get immediate help when workplace violence is happening or could happen;
- The way the employer investigates workplace violence incidents or complaints.

The reason for the program

The reason for the University program is to:

- Define workplace violence according to the *Occupational Health and Safety Act*;
- Summarize the roles and responsibilities of workplace parties who are affected by workplace violence;
- Describe the mechanisms to use to report incidents of workplace violence and get immediate help;
- Consolidate and present the results of workplace violence risk assessments by the University, including measures to take and steps to follow to monitor the identified risks;
- Present the investigation process for cases of workplace violence.

Scope

The violence prevention policy and program concern all staff members and all other users, for example, members of advisory committees, volunteers, partners, tenants and contractors, and applies to:

- all levels of the organization and all aspects of the workplace and working relationships;
- all activities that take place either in the work context or any other activity related to the University, including at events that happen outside the usual workplace, especially on business trips or at University social events.

With respect to students, their right to a respectful learning environment that is free of harassment and improper conduct is protected by other policies, laws and regulations, especially RHR-224-a, *Prevention of Harassment and Discrimination in the Workplace and Learning Environment*, RHR-224-c; *Prevention of Sexual Violence* and the accompanying procedures; the *Ontario Human Rights Code*; the *Criminal Code*; and professional ethics codes.

The policy and program primarily target situations of or threats of physical violence.

Definitions

Workplace violence: The threat, act or attempt to use against a staff member, in a workplace, physical force that causes them or could cause them physical injury.

Among the behaviours that could be considered as violence in a workplace, including outside the usual campus work environment (that is, other workplaces, off-campus events authorized by the University, authorized distance workplaces), we find:

- threatening behaviour such as making a fist, destroying property or throwing things;
- written or verbal threats that express an intention to cause physical injury;
- assault or use of a weapon;
- any other act that a reasonable person would see as a threat of violence.

This includes all sources of violence (customer, client, employer, supervisor, tenant, worker, stranger).

Civil authorities: City of Ottawa Emergency Services, including police, fire, ambulance and hazardous materials management services.

Joint Workplace Health and Safety Committee (JWHSC): A group of people representing employees and the employer, whose main role is to identify problems related to workplace health and safety and bring them to the employer's attention.

University community: Refers to everyone who has a connection with the University, in particular, but not exclusively:

- a) students, that is, people registered as students at the University, either full-time or part-time (including as a special student) in an undergraduate or graduate program;
- b) staff members, including all teaching personnel and administrative staff members, unionized or not, and those remunerated by a source other than the operating funds of the University, such as scholarships, research grants and external contracts;
- c) clinical supervisors holding the position of professor, assistant professors, visiting professors and emeritus professors, postdoctoral research fellows and research interns;
- d) contractors, consultants, suppliers or other bodies hired by the University to provide goods or services when on University premises or who perform functions defined by their relationship to the University;
- e) tenants on contract with the University to use University premises, goods or services;
- f) members of the Board of Governors, the Senate and their respective committees as well as members of advisory committees trained to help the University attain its objectives;
- g) visitors, including people with visiting student status, among others, students registered for a single course, volunteers and those on University premises to take part in an event at the University.

Supervisor: A person with responsibility for a workplace or with authority over an employee. The title “supervisor” is not a job title. It is the title associated with responsibilities that oblige a person regarding a place where work is done, paid or not, or related to determining duties carried out by people who work at, study at or visit the University, or volunteer or do an internship there.

Roles and responsibilities

The roles and responsibilities of workplace parties are defined in the *Occupational Health and Safety Act* and include the duties indicated in article 25 (Duties of employers), article 27 (Duties of supervisor) and article 28 (Duties of workers).

In the context of a workplace violence prevention program, the parties have the following roles and responsibilities.

Saint Paul University

As an employer, Saint Paul University has the following responsibilities:

- Develop a workplace violence prevention policy and review it once a year. The Policy Review Committee is tasked with this review. The Joint Workplace Health and Safety Committee is consulted.
- Develop a program to implement the policy, anticipating:
 - Risk identification and risk assessment of workplace violence based on the nature of the work, type of work or working conditions, including current circumstances that are specific to the workplace and sharing of results with the Joint Workplace Health and Safety Committee.
 - The measures to take and methods to follow to monitor risks identified during the assessment that could expose a staff member to physical injury;
 - The protocol to put in place to get immediate help when an incident of workplace violence is likely to occur;
 - The procedure to follow to report an incident of workplace violence to the University;
 - The investigative procedure for incidents or handling of complaints of workplace violence;
 - The regular review of the program, in collaboration with the Joint Workplace Health and Safety Committee.

The program is developed by Human Resources Services.

- Provide staff members with information (including personal information required to reasonably protect staff members) related to the risk of an incident of workplace violence involving a person who has a history of violent behaviour.

Supervisor

The supervisor is responsible for:

- Maintaining a healthy and safe environment (which includes workplace violence prevention) in the spaces for which they are responsible. When the situation is beyond their authority or control, the supervisor is responsible for forwarding information to the relevant University service or

- authority (e.g., hierarchical framework, Human Resources, Facilities, Protection Services).
- Providing staff members with information (including personal information required to reasonably protect staff members) related to the risk of an incident of workplace violence involving a person who has a history of violent behaviour.
 - Taking part in developing and implementing specific control measures for workplace violence (if needed).
 - Working with the appropriate University services (e.g., Human Resources) to investigate incidents of workplace violence.

University community

All members of the University community are responsible for:

- Reporting incidents of workplace violence to the relevant University authority or service (Protection Services, supervisor).
- Taking part in developing and implementing specific control measures for workplace violence (if needed).

Protection Services

Protection Services is responsible for:

- Receiving reports of incidents of workplace violence.
- Providing an immediate response, assistance and support when a report is received.
- Ensuring a link to civil authorities and supporting their response when an incident of workplace violence occurs.
- Defusing the violent situation, in collaboration with the relevant civil authorities (e.g., Ottawa Police Service).
- Collaborating with the relevant University services (e.g., Human Resources) to investigate incidents of workplace violence.
- Maintaining records or control measures related to demonstrations of workplace violence.

Human Resources

Human Resources is responsible for:

- Reviewing the workplace violence prevention policy.
- Reviewing and maintaining the workplace violence prevention program.
- Conducting and reviewing workplace violence risk assessments.
- Sending the Joint Workplace Health and Safety Committee the results of workplace violence risk assessments.
- Reporting to the Minister of Labour incidents of workplace violence in accordance with provisions of the *Occupational Health and Safety Act*.
- Guiding staff members (including those who commit violent acts or issue threats) to the Employee and Family Assistance Program.
- Filing a claim with the Workplace Safety and Insurance Board (WSIB), as needed.
- Organizing debriefings following an incident jointly with Facilities Services.
- Managing the sick leave of a staff member (if applicable) following an incident, including collecting the required information for managing the leave.
- Requesting medical or psychological information to confirm that a staff member is able to resume work and to do so safely.
- Organizing independent medical consultations (as needed) to confirm that a staff member is able to resume work.
- Managing the return to work of staff members affected.
- Managing the investigation process for incidents of workplace violence.

Joint Workplace Health and Safety Committee

Members of the Joint Workplace Health and Safety Committee have the authority and the responsibility to intervene in cases of risk of workplace violence under the *Occupational Health and Safety Act*. Based on the policy and program related to workplace violence, the committee's role includes:

- Consultation on the policy
 - The Policy Review Committee collects, on behalf of University management, comments and recommendations of the Joint Workplace Health and Safety Committee.
- Risk assessment

- The Committee must be informed of results of workplace violence risk assessments carried out by management and receive copies of assessment reports. Management is responsible for conducting risk assessments, which include the nature of the workplace and a description of the work and working conditions. The assessment must consider conditions that are prevalent in workplaces particular to the University.
- Notice of workplace violence
 - If, following an incident of workplace violence, a person becomes unable to do their usual work or needs medical care, but this incident did not result in death or serious injury to anyone, the University must, within four days following the incident, give the committee written notice of the incident containing the information and prescribed details. Human Resources advises the Joint Workplace Health and Safety Committee of incidents of workplace violence.
 - When the person has not been injured following a workplace violence event (e.g., incident or near incident), the event is reported to the committee in accordance with the reporting procedure to the Joint Workplace Health and Safety Committee following an incident of violence unrelated to work established by Human Resources.
 - However, when a person has been injured and needs medical care or is absent from work because of an incident of workplace violence, Human Resources must report the situation to the Workplace Safety and Insurance Board (WSIB).
- Refusal to work
 - Under the *Occupational Health and Safety Act* and this program, a person can refuse to work or to carry out a particular task if they have reason to believe that a situation of workplace violence, including threats of violence, could put them in danger. In the case of refusal to work because of a situation of workplace violence, consult the refusal to work process. In cases of imminent danger, contact Protection Services.

Inform staff members of the presence of a person who has a history of violent behaviour

Employers and supervisors must advise staff members of possible or real dangers they may encounter as part of their work, including risks of interpersonal violence. Under the *Occupational Health and Safety Act*, the employer and the supervisor must inform staff members about this when the following two conditions are present:

- As part of their work, a staff member can expect to encounter a person whose behaviour is violent;
- The risk of workplace violence is such that the staff member could sustain a physical injury.

Only those who are likely to sustain a physical injury must be advised. The need to advise staff members should be determined case by case. Any notice related to a person with a history of violent behaviour should include, in particular:

- The connection between the reported violence and the workplace;
- The seriousness of the previous violent behaviour (e.g., general or specific);
- The length of time since the last reported violent incident;
- The number of violent incidents reported or known;
- Existing measures and protocol in place;
- Other factors.

In most cases, it is not necessary to share medical information received or acquired with other staff members. If staff members must be advised of the presence of a person with violent behaviour, control measures or adequate and reasonable protocols are necessary.

If assistance or guidance is needed, contact Human Resources.

Report

All members of the University community are responsible for maintaining a violence-free workplace.

Reports of workplace violence are assessed by Protection Services, with the collaboration of the Ottawa Police Service (as needed), staff members or other University services (as needed), such as Human Resources, among others. Please note that any non-urgent situation can first be reported directly to the staff member's supervisor.

All reports and information obtained are treated as confidential and in accordance with the *Freedom of Information and Protection of Privacy Act*, the *Occupational Health and Safety Act*, the *Youth Criminal Justice Act*, the *Personal Health Information Protection Act*, and other laws and regulations.

Cases of violence

The University acknowledges the importance of reporting the warning signs of violent behaviour and of acting quickly to carry out a thorough investigation and to implement measures and protocols to resolve the problem. Members of the University community should report their experiences, events they have witnessed or any other potentially violent or threatening situation to Protection Services in one of the ways listed below.

In case of emergency (imminent danger or threat)

- Call 5555
- Use the emergency telephones located throughout the campus. Simply push the button to contact Protection Services.
- Go to the Protection Services office near the cafeteria at the Hazel Street entrance.

For a non-urgent situation (e.g., to discuss safety issues or if the danger is not imminent)

- Contact your supervisor
- Call 5555

If the situation deteriorates and there is imminent danger, see the section "In case of emergency" above.

Details to include in the report

The person who reports an incident of workplace violence must be prepared to provide as much

information as possible about the incident, including:

- Name, specific location or landmark, callback number and security level;
- Name and role of the person involved, including any injured, witnesses, suspects, etc.;
- Date and time of the incident;
- Location of the incident;
- Description of the incident, including known injuries or imminent dangers;
- Description of the person(s), their location (last known position or direction taken), or weapon, if applicable;
- Need for additional assistance (e.g., police or ambulance);
- Any other relevant information.

Physical risk factors in the workplace

A report can target more than actions or threats. Prevailing conditions in the workplace's physical environment can increase the risk of workplace violence and should be reported. For example:

- An area that is poorly lit or unlit;
- An area where visibility is reduced or obstructed (e.g., behind buildings, alleys, blind spots);
- Defective or damaged infrastructure elements (e.g., window, doors, locks, alarms);
- Invasive vegetation (e.g., bushes, trees).

Members of the University community should report these situations (or any similar situation) to their supervisor, to Facilities Services (when the situation happens inside or outside a building) or to Protection Services at ext. 5555 or (613) 236-9000.

Protection Services does regular patrols on campus. They identify potential dangers and make recommendations aimed at reducing the risk of workplace violence.

Family violence

In accordance with provisions of the *Occupational Health and Safety Act*, if the University becomes aware, or should reasonably be aware, of the fact that family violence that could expose a staff member

to physical injury in the workplace, it should take every reasonable precaution in the circumstances to ensure the person's protection.

If staff members believe that an incident of family violence could occur at work, they should tell their supervisor or Protection Services. The University will treat each situation case by case, with the staff member, the supervisor and Protection Services. The University will assess how existing measures and protocols can be combined to ensure the reasonable protection of staff members. The situation could require the development and implementation of a specialized response plan or assistance from an external resource (e.g., Ottawa Police Service, the courts).

In the case of family violence, the University could put measures in place even if the staff member wants no intervention to happen. The employer has a duty to take all reasonable precautions to protect all staff members, not only those who report a problem. In this case, the University works closely with the person affected to take reasonable precautions to prevent an incident of family violence in the workplace while seeking to respect the person's private life and sensitivity.

Steps following the receipt of a report

Regarding workplace violence, each case and each investigation is unique and requires an in-depth but rapid assessment. That is why, for all reported cases of workplace violence, the following first steps are taken:

- Initial assessment by Protection Services and, in a case of imminent danger (or threat), communication with civil authorities to get their assistance so they can begin their own response protocol.
- Protection Services calls upon other bodies within the University, including the director of Facilities, to assess the situation in more depth, communicate with civil authorities (as needed) and recommend measures to be put in place internally.

Comment: In case of emergency, immediate measures are taken, concurrently with these first steps.

Investigation process

A multiservice team, made up of representatives of Protection Services, Facilities, Human Resources and other services of the University conduct investigations related to incidents of workplace violence. The investigation is launched after de-escalation steps (those that follow the emergency response).

The multiservice team recommends to the parties concerned the measures they should take (improvements to infrastructure, development of a customized response plan, etc.). Temporary measures or procedures may be required during the implementation or development of permanent or long-term procedures or measures. These measures and procedures are applied case by case.

Disciplinary measures

Following the investigation, those responsible for committing acts of workplace violence will be subject to disciplinary measures which could lead to dismissal.

Criminal and civil charges could be brought against them, and other appropriate sanctions could be imposed depending on the person's connection with the University, such as being expelled from a program and being banned from entering University premises through the issuing of a notice of prohibition of entry without permission.

These measures are applied case by case.

Reprisals

A member of the University community who reports an incident of workplace violence in good faith under this program should not be treated unfairly or unjustly (directly or indirectly). Also, no person who is responsible for applying this program should be treated unfairly or unjustly.

However, anyone who makes false or frivolous statements or acts in bad faith under the program will be liable to disciplinary measures as provided for in their collective agreement or in applicable policies of the University.

Overall workplace violence risk assessment

The University management is responsible for the overall assessment of workplace violence risk factors, in particular:

- The nature of the workplace, the type of work and the working conditions, including physical and procedural aspects related to work, such as workplace location, field of vision, lighting, dangerous objects, the handling of valuables, work schedule, interactions with clients, immediate surroundings and the conditions under which work is performed (e.g., working alone or in isolation).
- Conditions that exist in the University's work environments or that would exist in similar work environments, that is, in other postsecondary educational institutions and, more broadly, in a teaching context.

Measures to take and steps to follow to monitor the risks noted during the assessment as having the potential to expose a staff member to physical injury are included in the risk factor assessment for workplace violence.

The assessment must be done as often as needed to ensure that staff members are protected at all times against workplace violence. The University's most recent workplace violence risk assessment and the recommended measures for containing risks are found in Appendix 1.

General measures for mitigating workplace violence risks

Security and protection are everyone's responsibility. As part of risk assessment, procedures and general measures for monitoring risk have been developed and implemented, especially:

- Proactive security monitoring – throughout the day, Protection Services staff do regular patrols on campus, inside and outside the buildings.
Foot Patrol – available from Protection Services at ext. 5555 or (613) 236-9000
- OC Transpo security measures:
 - Security on the O-Train (light rail) – Stations, including those that serve the University, feature security cameras, well-lit areas, emergency call buttons

- Alertus system – alert system that posts emergency messages on all of the University’s public computers and also issues this alert on a free mobile app for those who wish to use it.
- Directive on working alone – the University encourages the University community to avoid working alone or in isolation.
- Awareness activities and promotional campaigns – The Joint Workplace Health and Safety Committee conducts various communication activities for the University community (Occupational Health and Safety Week, etc.).

Guidelines in case of emergency

Violent situations are extremely rare, but when they happen, certain specific actions must be done. Depending on whether the event happens off campus or on campus, the directive “Hold and secure” or “Lockdown” will be issued. Each of these directives is linked to a series of measures to take to reduce the risks to which members of the University community are exposed until the civil authorities are able to contain the situation.

In addition to other tools, the University developed a mobile app to advise the University community of imminent danger, including acts of violence. This app, Alertus, includes push notifications that are activated in certain situations, such as an imminent violent event. People who wish to make use of it are asked to download the Alertus app.

Off-campus risks

The workplace sometimes extends beyond campus boundaries. Supervisors remain responsible for workplace violence risk assessment, including for staff members off campus.

Special mitigation measures may be required in specific circumstances related to off-campus travel. For example, the supervisor of a staff member who works abroad should check with a reliable source, such as “Travel advice and advisories by destination” from Global Affairs Canada, on the risk of violence in the destination country.

Supervisors and managers must determine and assess the risk of violence off campus and communicate regularly with staff members working off campus.

Training

All members of Saint Paul University staff must do Violence Prevention training. This training is part of the onboarding process for new staff members. It is done entirely online, at one's own pace. It covers legal requirements for Ontario, the Saint Paul University policy, how to get help, the procedure for reporting workplace violence and a quiz.

The training is reviewed and updated regularly, in cooperation with the Joint Workplace Health and Safety Committee. For any questions about the training, contact Human Resources.

Available resources

- Employee and Family Assistance Program: <https://homeweb.ca/>
- Foot patrol: ext. 5555 or (613) 236-9000
- Occupational Health and Safety Act: <https://www.ontario.ca/page/occupational-health-and-safety-act-ohsa/>
- Workplace violence legislation: https://files.ontario.ca/wpvh_guide_english.pdf
- Ontario Ministry of Labour: <https://www.ontario.ca/page/ministry-labour-immigration-training-skills-development/>
- Ottawa Police Service: 9-1-1
- Mental Health Commission of Canada: <https://mentalhealthcommission.ca/>
- Community Legal Services of Ottawa: <https://www.clsottawa.ca/>
- Crime Prevention Ottawa – Victim Services: <https://www.crimepreventionottawa.ca/>

Appendix 1 – Results of the workplace violence risk assessment

NO.	ACTIVITY	FREQUENCY	SEVERITY	SCORE	RISK REDUCTION AND EXISTING CONTROLS
1	Risk related to entry control and security system.	4	2	6	<ul style="list-style-type: none"> • ID cards limit access to certain areas. • Security cameras are present and access to images is restricted. • Some areas are labelled “Staff only.” • An SPU ID card is needed to enter the library. • The library door is locked and guests must register.
2	Risk related to assessing reception and waiting areas.	3	2	5	<ul style="list-style-type: none"> • Clear sight lines • Means of communication • Signage (business hours) • No heavy or sharp objects
3	Risk related to assessment of public counters.	3	2	5	<ul style="list-style-type: none"> • Visibility and privacy films or screens • Barrier (unbreakable) • Ext. 5555 (613) 236-1393), (613) 236-9000, or 9-1-1 • Enlargement of service counters • Public counters are cleared of all “dangerous” objects
4	Risk related to interior spaces / hidden spaces (laundry, etc.) / and lighting.	2	2	4	<ul style="list-style-type: none"> • Restricted public access • Clear sight lines • Locked doors
5	Risk related to stairwells and exits.	2	1	3	<ul style="list-style-type: none"> • Exit signs • Good lighting • No obstacles • Staff inform Campus Services when there are problems or defects.

6	Risk related to assessing public meeting rooms, interview rooms, treatment rooms or board rooms.	3	2	5	<ul style="list-style-type: none"> • Clear sight lines • Meeting rooms and spaces have glass walls. • All the doors of public meeting rooms have a window, so people going by in the hallway can see in – if needed. • Phones are available to call Security if needed.
7	Risk related to the location of cash, goods and medications, as well as other objects of tangible value.	2	1	3	<ul style="list-style-type: none"> • Access is limited. • Barrier at the public counter (breakable) – lockable cash register balanced daily. • Money is removed every night. • A combination safe is used for petty cash. • The safe is not visible through windows or doors. • A first aid kit is kept at reception, in a drawer, and staff know where it is, if it's needed.
8	Risk related to workplace location (common facility / neighbouring businesses / neighbourhood).	3	2	5	<ul style="list-style-type: none"> • Security staff make regular visits.
9	Risk related to the use of security systems and the workplace, as well as personal safety devices needed to protect workers.	2	2	4	<ul style="list-style-type: none"> • There are emergency phones at the Counselling and Psychotherapy Centre and mobile phones for Protection officers. • Phones are not necessary, but they have access to a phone at the counter or in the offices, and employees have their mobile phones. • The Emergency Management and Notification System (EMNS) is tested twice a year. • Recording is automatic. • Emergency notification system by interphone in the library. • An emergency plan is available.

10	Risk related to the ability to assess a designated safety zone where workers can go if there is an incident of workplace violence.	2	2	4	<ul style="list-style-type: none"> • If the University is evacuated, Immaculata High School will be used. • Based on the emergency, there is a security plan for the University. • Staff-only areas are also locked.
11	Risk related to workplace security measures or personal security devices, and whether workers and supervisors are trained in all relevant measures and procedures that will protect them from violence related to the physical environment of the workplace.	2	2	4	<ul style="list-style-type: none"> • Training for EMNS just happened. • Mandatory health and safety training was given in May 2023 (workplace security, violence, cybersecurity). • Training on the emergency plan • The emergency plan is available on the website. • Workers and staff meet regularly to discuss problems, and there is a user manual for people who work at reception in the library. • Regular meetings of the Joint Workplace Health and Safety Committee are planned.
12	Risk of violence related to handling very sensitive, personal, valuable or controversial matters.	2	2	4	
13	Risk of violence related to decision making that affects academic or professional standing.	2	2	4	

LEGEND

FREQUENCY		
1	Rare	It is so unlikely, people think it will never happen.
2	Unlikely	Unlikely, but possible.
3	Possible	Could happen sometime during the lifespan of a project.
4	Probable	Could happen several times during the lifespan of a project.
5	Certain	Could happen often during the lifespan of a project.

SEVERITY		
1	Insignificant	A very minor incident, less than a minor incident.
2	Minor	Minor injuries, minor damage to facilities, minor and limited environmental exposure.
3	Moderate	Time lost due to injury (short term), short-term loss of access to facilities, recoverable release into the environment.
4	Major	Permanent disability, serious injury with work time lost, partial loss of access to facilities and significant release into the environment.
5	Catastrophic	Death, loss of facilities, release into the environment that puts the public in danger, regulatory intervention.

NO.	SEVERITY	FREQUENCY		
		Possible (3)	Probable (4)	Certain (5)
1	Insignificant (1)	3	4	5
2	Minor (2)	6	8	10
3	Moderate (3)	9	12	15
4	Major (4)	12	16	20
5	Catastrophic (5)	15	20	25