



OHS Guidance

In-Person Service Delivery Network

June 22, 2022

Context

- With the removal of travel restrictions and as we get more familiar with living with the realities of COVID-19 people have resumed travelling and this has placed significant pressures on the Passport network:
 - This has resulted in extremely long lineups outside of certain Passport Offices (and in Service Canada Centres, where clients may also receive service).
 - In some areas, clients are lining up during the night and depending on the length of the lineup may not be served that day, resulting in some clients being increasingly aggressive and displaying harassing behaviour.
- Citizen Services Branch proposed sending employees or management out to “break the line” and triage clients.
- Client harassment and violence are significant hazards and require proper protocols, procedures, and equipment to be in place to mitigate these hazards to the greatest extent possible.
- Psychological hazards, such as the mental stress of dealing with extremely high volumes of aggressive clients all day everyday, should not be overlooked either.

OHS Guidance related to “breaking the line”

- Establish or update procedures/protocols for those breaking the line or undertaking Staff Flow Solutions, based on national guidance, identified or potential hazards, and local conditions or considerations.
- Before implementing Staff Flow Solution, the employees who will perform this work (regardless of group and level) must be aware of the procedures/protocols to follow when engaging in this process.
- Ensure they are familiar with guidance provided in training on [Dealing with Distressed and Difficult Client Behaviours](#), [Guidance on Dealing with Abusive Client Behaviours](#) and the [Front Line Employees Guide to Emergency Situations](#).
- Know when to summon the authorities. **DO NOT** engage in confrontations with aggressive clients, or put themselves in a position where they are not able to physically leave the situation easily (i.e. be aware of their surroundings and do not position themselves where the client is between them and their path of exit).
- The employees who remain in the office, must also be aware of any procedures/protocols that apply to them while the other employees are engaged in the Staff Flow Solution.
- Always wear a mask as outlined in the Directive on the [Required Use of Face Masks](#) and maintain a reasonable distance between themselves and the client, given the lack of a physical barrier.
- Wear a portable panic alarm and/or carry portable communication device (such as a two-way radio):
 - Ensure the employees in the office know how to respond to a portable panic alarm being activated.
- Deploy Staff Flow Solutions in groups or pairs if possible:
 - If not possible to deploy a Staff Flow Solution in pairs, stay in the line of sight of other employees inside the office and/or the commissionaire.
- Advise colleagues of your intention to deploy a staff flow solution and when they expect to return:
 - Someone in the office needs to monitor how long they have been gone and know what to do if they have exceeded their expected return time.

Employer’s Responsibility

- Under 124 of the *Canada Labour Code, Part II* the employer has a responsibility to **ensure the health and safety of its employees** is protected while at work (this includes in settings outside of the physical workplace, or that the employer does not control).
- Under 125 (1) of the *Canada Labour Code, Part II*, the employer has a responsibility to:
 - (q) **provide each employee with the information, instruction, training and supervision** necessary to ensure their health and safety at work;
 - (s) ensure that **each employee is made aware of every known or foreseeable health or safety hazard** in the area where the employee works;
 - (y) ensure that the activities of every person granted access to the work place **do not endanger the health and safety of employees**;
 - (z) ensure that **employees who have supervisory or managerial responsibilities are adequately trained in health and safety and are informed of the responsibilities** they have under this Part where they act on behalf of their employer;
 - (z.06) **consult the work place committee or the health and safety representative** in the implementation of changes that might affect occupational health and safety, including work processes and procedures.

Recommendation

- Ensure proper protocols are in place and are adjusted to adapt to changes in conditions;
- Take measures to ensure affected employees and their supervisors, regardless of group and level, are aware of and are adequately trained on the proper protocols, procedures, and equipment required to “break the line”;
- Consult the workplace health and safety committee on these changes; and
- Document these actions so it can be demonstrated that the employer has met their responsibility.