

Threat Assessment Procedure

Date of Approval: December 14, 2021

Effective Date: February 1, 2022

Mandatory Review

Date: *December 14, 2026

*This procedure will be reviewed one year after its initial implementation.

Approved By:

Threat Assessment Team (or designates)

1. Purpose

The purpose of this procedure is to support the implementation of the Threat Assessment Policy by outlining how The Sheridan College Institute of Technology and Advanced Learning (Sheridan) will assess and respond to actual and/or potential Threats or acts of violence.

2. Scope

This procedure applies to Sheridan Community Members and extends to any on or off campus activity, including Sheridan Sanctioned Activities and information that is obtained from other sources that may affect the safety of the Sheridan Community.

Nothing in this Policy restricts an employee exercising their rights under a relevant collective agreement.

Any written communication will be provided in an accessible format or with communication supports, upon request.

3. Definitions

“Imminent Risk of Violence” requires consideration within the context of each situation. The factors to consider include:

- **Clarity:** The specific identification a particular individual or groups of intended targets.
- **Seriousness:** The intended target(s) are in danger of being killed or suffering serious bodily harm.
- **Imminence:** The threat creates a sense of urgency to act in order to prevent harm to an identified target(s).

Interim Measure includes a measure immediately imposed on an individual where there is a potential risk to any member of the Sheridan Community. Interim Measures include but are not limited to:

- Communication bans or no contact measures. Clear communication to the individual that the behaviour is unwelcome and must stop;
- Campus restriction from particular area(s) or service(s), including attending classes (in-person or virtual);
- Temporary removal or relocation from student housing;
- Temporary restriction from access to any Sheridan campus (interim trespass);

- Interim suspension (interim suspensions may extend to all academic, co-curricular, or extra-curricular activities);
- Limiting access to Sheridan facilities;
- Making arrangements for alternative supervisory relationships, teaching or grading.

“Procedural Fairness” means acting fairly in administrative decision making. This includes providing a person with the opportunity to be heard and to be made aware of the evidence by the decision maker.

“Sheridan Community Member(s)” include Students, course participants, employees, supervisors, student workers, Board of Governors members, members of committees, societies or associations established or recognized by Sheridan, contractors/subcontractors hired by Sheridan (including Sheridan’s Work-Integrated Learning Partners), providers of service or research, volunteers, visitors or guests, applicants for admission or employment, and others who attend on campus, or who are otherwise connected to Sheridan’s operations.

“Social Media” means a broadly accessible Internet-based communications platform used to interact with other users and share content among a network. Examples of Social Media include but are not limited to Facebook, Twitter, Tik Tok, We Chat, LinkedIn, YouTube, Flickr, Instagram, Snapchat, Pinterest, blogs, and Wikis.

“Sheridan Official” means an employee and/or representative of Sheridan acting in the course of their duties.

“Sheridan Sanctioned Activities” means an activity approved and/or supported by Sheridan on or off Sheridan property in Canada and internationally. This may include but is not limited to coop, placement, inter-campus shuttle buses, field trips, sporting competitions, off-campus lectures, or any other events sponsored by a Sheridan Official.

“Student” means any individual who is admitted, enrolled or registered for study at Sheridan. Individuals who are active in a program, but not enrolled in classes for a particular term (e.g., on a scheduled break, or co-op term) are considered to have a continuing student relationship and are included in the definition of a student.

“Visitor” means an individual who is authorized to be on Sheridan Property, but is not a Student, Employee, or Contractor.

“Threat” means a behavior or a statement that is expressed as an intent to cause physical or mental harm or is reasonably interpreted as an intent to cause physical or mental harm against the Sheridan Community.

“Threat Assessment Procedure” means the steps that will be taken by the Threat Assessment Team to assess and manage Threats or risks of violence to Sheridan Community Members.

“Threat Assessment Team (TAT)” means the interdisciplinary body made up of Sheridan Officials that manage and provide a response to a threat. TAT members include all or a subset of the following (or designates):

- Director, Security
- General Counsel
- Manager, Occupational Health and Safety Services
- Manager, Student Rights and Responsibilities
- Manager, Security Operations
- Manager, Emergency Management
- Associate Dean, Community Citizenship

- Director, Human Rights and Equity initiatives
- Director, Employment Relations and Talent Acquisition
- Vice President, External Relations
- Security Investigations Coordinator

The Director, Security (or designate) is responsible for the overall coordination of the TAT process, which includes scheduling meetings in a timely manner, managing internal communications, maintaining records, and following up on decisions of TAT, as required.

“Worrisome Behaviour” means behaviour by Sheridan Community Members that causes concern for student success, well-being and/or impacts the educational process or the Sheridan Community.

4. Procedure

1) Responding to an Immediate Risk

- Step 1:** Sheridan Community Members should call **911** and/or campus security if they are faced with an immediate risk or threatening situation that requires a response from local authorities. **Campus security can be reached at ext. 4044 from within Sheridan or 905-815-4044 from outside Sheridan.**
- Step 2:** Upon addressing a known immediate risk, The Director, Security will conduct a preliminary assessment, based on the information available, to determine whether the situation requires a formal TAT meeting. The Director, Security will utilize the threat levels in section 2(b) of this procedure to conduct a preliminary assessment and may consult with relevant departments at Sheridan, if required. Section 3 of this procedure is enabled if a TAT meeting is required.

2) TAT Meeting Process

- If there is no immediate emergency but a Sheridan Community Member has a reason to believe that there is potential for the safety of the Sheridan Community to be endangered due to Worrisome Behaviour or a Threat, [a report should be made by the Sheridan Community Member to campus security](#) and/or by downloading the [Sheridan ALERT! App](#).
- Upon receiving the report, a preliminary assessment will be made on the risk level by the Director, Security, and any relevant departments and/or TAT members at Sheridan. The timeline for calling a TAT meeting will be based on the assessed threat level:
 - **High Risk – Meet within twenty-four (24) business hours or as reasonably practicable:** assessed risk indicates the individual is at Imminent Risk of Violence, and immediate intervention is required to prevent an act of violence from occurring. The findings in this assessment could include the following:
 - Threat is specific and realistic. There is an identified target (i.e., clear). Individual has the capacity to act on the threat.
 - Information suggests concrete steps have been taken toward acting on threat (i.e., imminent). For example, the individual has acquired or practiced with a weapon or has had a target under surveillance.
 - Information suggests strong concern about the individual's potential to act violently (i.e., serious).
 - Significant deviation from baseline behaviour. Violence is a continuing process of thoughts and behaviours that is dependent on the interaction between a person who is inclined to violence; a stimulus that causes the

violence; and a setting that allows for violence or does nothing to prevent a violent act from occurring.

The Director, Security may implement Interim Measures to protect the Sheridan Community prior to the TAT meeting. Interim Measures will be developed in consultation with relevant departments at Sheridan and will remain in place until advised otherwise in writing.

- **Medium Risk – Meet within twenty-four (24) to forty-eight (48) business hours or as reasonably practicable:** both high and medium risk assessed risk indicates that the threat could be carried out, although it may not appear entirely realistic. Violent action is plausible. The findings in this assessment could include the following:
 - Information gathered suggests that some thought has been given to how the threat will be carried out (i.e., possible place and time).
 - No clear indication that the individual of concern has taken preparatory steps (i.e., weapon seeking), although there may be an ambiguous or inconclusive reference point to that possibility. There may be a specific statement seeking to convey that the threat is not empty (e.g., “I’m serious”).
 - Moderate or lingering concerns about the individual’s potential to act violently.

The Director, Security may implement Interim Measures to protect the Sheridan Community prior to the TAT meeting. Interim Measures will be developed in consultation with relevant departments at Sheridan and will remain in place until advised otherwise in writing.

- **Low Risk – Formal TAT meeting not required:** assessed risk indicates that a minimal risk exists. “Low” categorization of risk does not imply “no risk”, but indicates the individual is at little risk for violence and periodic review of the matter may be appropriate at this time. The findings in this assessment could include the following:
 - Threat is vague and indirect.
 - Information contained within the threat is inconsistent, implausible or lacks detail, threat lacks realism.
 - Available information suggests that the person is unlikely to carry out the threat or become violent.

For low-risk threats, a TAT meeting may not be required but consultation with relevant departments may take place to confirm the approach to be taken. Consultation with TAT members will take place if the threat level escalates. If it is determined that a TAT meeting is not required, the situation will be reviewed periodically and may be referred to a different procedure or office including Students Rights, Student Wellness and Health Services, CEI, or Human Resources.

3) TAT Meeting

- a) **TAT Composition:** TAT meetings will include representation from a core group of member departments/divisions. This includes Security Services, Centre for Equity and Inclusion, Student Rights and Responsibilities Office, Office of General Counsel, Occupational Health and Safety, Emergency Management, and Human Resources. Other members may be invited as required.

NOTE: Human Resources will not participate in TAT meetings when the individual making the threat or alleged threat is not an employee and SRRO will not participate in TAT meetings for

threats or alleged threats made by an employee. The Director, Security, in consultation with relevant stakeholders, may amend this practice depending on the specific case under review.

- b) Review and Assessment:** The TAT will review all available information about the threat to form a comprehensive picture of the individual's pattern of behaviour. The TAT will use a risk assessment tool to determine the risk level, as required.

As examples of available information, the TAT may consider the following when conducting the assessment:

- Student or employment record, including any past disciplinary history, if appropriate in the circumstances. Employment records may be referenced for employee made threats.
- Information obtained from publicly available and open sources (e.g., Social Media, news articles, etc.).
- Information obtained from individuals (e.g., faculty, staff, students, local authorities, parents/guardians, acquaintances etc.) and family members that have information about the situation.
- Information obtained from the individual making the threat. The individual will be contacted to provide additional information and a response to any specific information that the TAT is considering as part of the review of information.
- Whether another established process at Sheridan is more suitable to address the situation.

Information that is reviewed by TAT will be sufficiently redacted to protect the privacy of individuals.

These inquiries may be made by the TAT acting as a convened group, a smaller group of designated members or a designated TAT individual.

The TAT may also rely on other experts to advise on a specific matter under review.

TAT will consider and respect concurrent proceedings when assessing a matter. This may include holding the TAT process in abeyance while concurrent proceedings are ongoing. However, the TAT process will not be put in abeyance if there is an Imminent Risk of Violence for the Sheridan Community.

An individual who is the subject of this threat assessment procedure will normally be informed of the allegations against them and to have the opportunity to respond in full. Disclosure will be balanced with Sheridan's obligation to keep the Sheridan community safe.

- c) Response Plan:** TAT will develop a response plan once the assessment has been completed. The response plan will be appropriate to the situation and level of threat. Several meetings may be required to complete a response plan. Response plans could include, but are not limited to, the following:

- Referral to support services
- Referral to a different office and/or process at Sheridan
- No contact orders
- Conditions or restrictions on activities (in-person or virtual)

The response plan and any Interim Measures related to students will be approved by the Director, Security and Associate Dean, Community Citizenship. For employee made threats, the response plan and any Interim Measures will be developed in consultation with Human Resources. Interim Measures will remain in place until advised otherwise in writing.

The individual will be made aware of the response plan in writing, and, in the appropriate circumstances, the individual will be given the opportunity to provide any additional information to the TAT before it is implemented.

Where relevant, Occupational Health and Safety Services will be advised of any consequences resulting from the implementation of a response plan to manage Sheridan's obligations pursuant to the Occupational Health and Safety Act.

d) Reassessments:

A person may submit a request for a reassessment of a measure imposed in a response plan to the Office of Risk Management within ten (10) business days of receiving written notification of the response plan. The grounds for the request for a reassessment must be:

- There was a fundamental procedural error; or
- There was a failure to comply with applicable legislation; or
- Relevant evidence emerged that was not available before the decision-making process was completed.

The original decision will stand pending the outcome of any reassessment.

The request for a reassessment will be reviewed by the Office of Risk Management, in consultation with the Office of General Counsel and any other relevant departments, to make sure it meets the grounds set out above. If the request is made by an individual that is not an employee, the Director, Security and Associate Dean, Community Citizenship will process the request for reassessment by the Dean of Students and Chief Risk Officer. If the reassessment is requested by an employee and meets the grounds set out above, the Director, Security will process the request for consideration by the Chief Risk Office and Director, Employment Relations and Talent Acquisition. Any members of the TAT or external parties may be consulted by the Dean of Students, Director, Employment Relations and Talent Acquisition, and/or Chief Risk Officer when considering the reassessment.

A decision will be provided to the individual in writing within a reasonable period and will be based on one of the following outcomes:

- a) The reassessment will be dismissed with no further assessment needed
- b) The response plan will be referred back to the TAT for reconsideration
- c) The response plan will be affirmed
- d) The response plan will be amended based on the evidence presented.

e) Case Status: The TAT will manage cases based on their status:

- **Active:** The situation is ongoing. This includes cases that have not yet been resolved by TAT and cases that will require periodic review upon the implementation of a response plan. TAT meetings will be scheduled as required.
- **Closed:** The issue has been addressed or has been referred to another established process at Sheridan. The closing of a matter by TAT is independent of and does not influence the:
 - initiation or continuation of a law enforcement investigation into the individual's conduct by campus or local law enforcement authorities.
 - initiation of any proceedings by the Student Rights and Responsibilities Office.
 - Initiation of any proceedings by Occupational Health and Safety Services.
 - imposition of disciplinary sanctions or the initiation of disciplinary proceedings, or other appropriate action against an employee.

- f) **Frequency of TAT meetings:** The Director, Security will schedule a meeting within twenty-four (24) hours or as reasonably practicable for high/medium risk threats. A meeting will be scheduled within a reasonable period of time for low threats.

Any member of TAT can request a meeting to be held if they become aware of information related to a situation that is being actively addressed or periodically reviewed by TAT.

The TAT will meet as frequently as needed for active cases and monthly for cases that require periodic review. In the absence of any new cases, the TAT will meet monthly to review relevant topics related to their mandate. This can include developments in threat assessment methodologies, resource availability, training, outreach, confidentiality and privacy issues, legislative changes, etc.

4) Communications

Depending on the situation the media may be interested and/or present on campus. The Director, Security will consult with the Vice President, External Relations, or designate, about what information, if any, can be conveyed and who will be designated as the official spokesperson.

For communication with the Joint Health and Safety Committee(s) or the Health and Safety Representative(s), the Manager, OHS, will provide information respecting occupational health and safety as per the Occupational Health and Safety Act.

5) Confidentiality

Sheridan respects the privacy of all individuals going through the threat assessment process. The TAT will carry out its activities in accordance with the relevant legislation, and any related policies maintained by Sheridan.

IMPORTANT NOTE: This procedure does not prevent an individual from taking appropriate and immediate actions to address emergency situations. Sheridan Community Members should first address the emergency, using established processes, and then, if appropriate, refer the case to the appropriate process or office.

5. Related Documentation/Links/Forms

- [Student Code of Conduct](#)
- [Student Code of Conduct - Adjudication Process and Appeals Procedure](#)
- [Code of Professionalism and Civility](#)
- [Accessibility Policy](#)
- [Residence Community Living Standards](#)
- [Health and Safety - Occupational Health and Safety Policy](#)
- [Workplace Violence Policy](#)
- [Threat Assessment Policy](#)
- [Social Media Policy](#)
- [Academic Standing Policy](#)
- [Admission Policy](#)
- [Sexual Violence Policy](#)
- [Discrimination and Harassment Policy](#)
- [Ontario Human Rights Code](#)
- [Free Speech Policy](#)