WORKPLACE VIOLENCE PREVENTION MANAGEMENT SAMPLE POLICY GUIDE

Introduction: The prevalence and type of workplace violence is very specific to geography, logistics of the building and its grounds, and the socio-economics of the surrounding neighborhood. Therefore, this outline is designed to guide users through issues for consideration, rather than specific items to include in your policy.

PURPOSE: *This guide outlines a facility's policy and establishes guidelines in managing and reducing the potential for workplace violence at the facility.*

OBJECTIVE: *The objective is to ensure the highest standard of health and safety for all employees, residents, vendors, contractors, and the general public and to provide for the efficient and effective operation of the facility.*

[] <u>Definitions</u>:

Define the following verbiage as set forth by the Workplace Violence Prevention Research Institute, to establish and clarify terms and expectations.

Verbal Harassment:

Verbal threats toward persons or property; the use of vulgar or profane language toward others, disparaging or derogatory comments or slurs, offensive sexual flirtations and propositions, verbal intimidation, exaggerated criticism, and name calling.

Physical Harassment:

Any physical assault such as hitting, pushing, kicking, holding, impeding or blocking the movement of another person.

Visual Harassment:

Derogatory or offensive posters, cartoons, publications or drawings.

[] Appropriate Responses to Harassment or Threat:

This should include the protocols staff is to follow when confronted with a threat or a harassing situation with a member of the public, visitor, contractor, or coworker. You may want to distinguish expected appropriate behaviors based on the degree of threat or harassment. This applies to dealings with members of the public, visitors, family, vendors, contractors, consultants, and coworkers.

Ex. At any time an employee feels verbally or visually harassed by a visitor, vendor or associate, they should excuse themselves, refrain from arguing, retorting, or responding in kind, and notify their supervisor or a member of management.

Ex. At any time an employee *realizes* that they, or the people around them, are seriously threatened, or are in great danger (believes that serious and *probable* bodily harm exists, i.e. display of a weapon or very volatile behaviors), they should notify someone else as quickly as possible to notify supervisors and management and call for help.

[] Protocols for Visitors/Vendors/Associates:

1) Specify protocols for visitors, vendors, associates or anyone else entering the building.

2) Specify protocols for after hours, when there is limited staff and no receptionist.

3) Specify protocols for a wandering stranger in the facility.

Ex: Anyone entering into the building must immediately verify to the receptionist, their identity, person they will be meeting, and purpose of their visit. They must sign in. The receptionist will confirm the information and direct the individual to the appropriate place, or to wait in the waiting area.

Ex: Visitors, vendors, or associates who are asked to arrive at a time during off hours, or when there may be no receptionist, should be previously instructed to sign in and proceed directly to the place of business and/or a specific individual to *"check-in"*.

Ex. Any visitors, vendors, or associates seen to be loitering, wandering, or lost, especially during off hours, should be addressed immediately by available personnel, either personally, or by immediately contacting appropriate personnel. (*Specify here, exactly what titles have this responsibility.*) Personnel should politely ask if they can help the individual, verify their identify and business, ask them to sign in, and direct them to the appropriate place and/or person. Personnel should exercise discretion as to whether or not they should accompany the individual until he or she has *"checked in"* with the person they are meeting with.

[] Prohibited Items on Property: *Author suggests that all facilities adopt this policy.*

Under no circumstances are the following items permitted on facility property, including parking areas: all types of firearms; switchblade knives and knives with a blade longer than four inches; dangerous chemicals, explosives including blasting caps, chains and other objects carried for the purpose of injuring or intimidating. This applies to *any* person on site at the facility including employees, visitors, contractors, etc.

Employees, visitors and venders alike should be discouraged from bringing and leaving any valuables on facility grounds without specific purpose(s) to their business or visit

there. Some facilities provide for a check-in service for valuable items that had to be brought in and stored for the day (i.e. gift items kept for the day for an event immediately after work, special vender equipment requiring storage overnight, etc.)

[] Reporting of Incidents:

As in the reporting of any and all incidents and accidents, employees should be urged to immediately report any and all incidents of harassment, threats, intimidation, or act of violence to their supervisor, or another supervisor or the director if the problem is their supervisor. The supervisor must report the incident to the department head immediately, or as soon as practicable.

[] Investigation of Reported Cases:

Select members of management must review the facts of all reported cases of threats, harassment, intimidation, and acts of violence among employees and non-employees to determine validity, degree of offense, and the proper response. This may range from interviews, eyewitness accounts, collection of evidence, and verification of these. Written statements are to be taken. A file or log should be initiated to track developments and provide a document trail for all activities of investigation, findings, and the response.

The investigation team should usually consist of the direct supervisor, department head, human resource, and any other persons who are connected with the business of the offending individual. This may include the social worker, or admissions person if the reported offender is a resident or family member, or the employee that is dealing with a reported offending vendor, etc. Of course, if the reported offending individual is, in fact one of these, they shall not serve on the investigation team.

The depth and immediacy of the investigation and the timeliness of its completion should be dictated by the degree and immediacy of the situation. However, the investigation and formal response should be completed and documented within 7 days.

The appropriate response can range from a short informal or formal meeting with the offending individual, explaining the facility's policy on conduct. Or, it may take the form of progressive discipline, to termination for employees. In the case of visitors, it can take the form of progressive warnings, to a ban from certain parts of the facility (ex: restricted to the lobby), or the entire facility grounds. The same would apply in the case of vendors. The facility may deem it prudent to cease doing business with the vendor, or contact the management, inform them about the situation, and see if they will respond to your satisfaction. In any case, depending on circumstances, it may even call for immediately contacting the police and ambulance, and pressing charges. Obviously, appropriate responses should be aligned with the severity and validity of the offense, the probability of risk, the resulting damage if any. It is best to document how the investigation team arrived at their decision to respond to illustrate the judgment used.

Fair and reasonable alternate investigation procedures must be available in the event that it is a management personnel that has been reported, particularly, higher and top management personnel.

[] Restraining Orders:

Employees may be victims of domestic violence or stalkers. These issues may cross the boundaries from the personal realm and into the workplace as their perpetrators may follow them into the workplace or try to find them there. It is imperative that management is cognizant of such problems, and the impact it could have on its operations. Management should communicate its desire to be aware of, and its willingness to cooperate with employees who require restraining orders to keep such issues at bay. This provides a certain degree of comfort for the affected employee. Such proactive activities also provide for the facility's overall security.

(Incidents of resident abuse perpetrated by visiting family members do occur. The management of such incidents are beyond the scope of this policy. Proper protocols in reporting and handling such incidents should include discussions with the social worker and admissions coordinator, and may require notification of FRIA, DOH, and/or the Ombudsman.)

Employees must notify management of any attempts to gain a restraining order, or restraining orders that do exist, for spouses or stalkers that are in effect. Such employees should supply the facility with a description of the individual, (a photograph if possible), the history of violence or harassment in this relationship, whether the individual has access to firearms, weapons or other potentially destructive and violent tools or materials, and as much other information as possible as to potential times, days, or periods whereupon this individual may be more actively seeking to enter the facility. Management will ensure that facility security and select management personnel be made aware of, and kept up to date on, this information.

[] *Former Employees:*

Policy should be set for the proper handling of uninvited returning former employees who are acquainted with the grounds, and the personnel. Most former employees who wander into the facility uninvited and sometimes unannounced, are entering on neutral, if not friendly, terms. However, if an employee was terminated on grounds of inappropriate conduct, or on poor terms, and was considered a security risk at the time, their uninvited return can also pose a significant risk. Policy must dictate how to differentiate these uninvited appearances, and how to handle the ones with potential risk.

Individuals who may pose a potential risk should be identified at the time of discharge. Appropriate personnel should be notified of the status of individuals as being *identified risk discharged employee*, and accompanying protocols to follow should the individual return. This could include immediately contacting the administrator, or human resource director to speak to the individual, prevent any disruption, diffuse any developing hostility, and escort them out. If the individual refuses to leave and presents a continued risk, the police may have to be contacted to remove the individual. Repeated visits that

dramatically threaten the safety and security of the employees and residents may call for the pursuit of a restraining order.

[] Substance Abuse: References and highlights can be made here to the facility's policy on drug and alcohol use and abuse. We underscore the fact that a great majority (77%) of acts of violence are perpetrated by individuals with substance abuse problems.

[] Criminal Activities:

Any and all incidents of suspect criminal activity will be thoroughly investigated and referred to local authorities. Anyone (employee, visitor, contractor, etc.) found perpetrating a criminal act within facility grounds, including its parking lot, will be immediately terminated.

[] Locker Inspections:

Routine unannounced locker inspections, with the employee present, may be instituted to promote good hygiene and housekeeping, and to deter the storage of stolen items, weapons, alcohol and illicit drugs.

[] Bag Searches:

Facilities may reserve the right to inspect bags that enter and leave the facility. Some facilities provide a checking service for employees bringing in large or expensive items that they must have with them on special occasions (see section on *Prohibited Items*). Again, this provides for screening out weapons, drugs, alcohol, expensive items vulnerable to theft, etc. It also screens for stolen items leaving the premises.

(It is beyond the scope of this sample policy on workplace violence prevention to cover theft control issues, although it may be appropriate to make references to theft control policies at this point.)

[] Riots & Civil Disobedience:

Facilities should review their likelihood of being a target for hate or bias crimes, especially for facilities of a particular faith, vocation, or heritage, and a facility's general vulnerability during civil disobedience (looting and riots due to loss of power, or civil unrest). Facilities should plan for these events, including an assessment of the adequacy of security on the grounds and procedures under such circumstances.

[] Security & Security Personnel:

Are the security of the grounds, property, and people, adequate? A nursing home strives for a relaxed, homelike atmosphere. However, it may be subject to heavy traffic at times.

Without proper procedures, it can seem like a public thoroughfare. Part of the security question also depends on the specific lay-out of the facility, entrance area, and commonly trafficked areas. Can a stranger, unfamiliar with the grounds easily access other parts of the facility before passing areas of administration, or can they immediately access large groups of residents?

Keep in mind that there is an entire population of highly vulnerable residents, along with a staff (a skeletal one for certain shifts), strongly dominated by female paraprofessionals and aides. If nothing else, a facility must consider the steps a receptionist, or the night shift, can take should an altercation occur.

Where necessary, security personnel with a certain degree of personal, professional, and physical strength may be considered. Such persons must be able to appropriately handle all types of visitors. This individual must be able to: warmly and courteously receive familial members; professionally receive and direct associates and vendors; provide assistance, direction, implement proper procedures; escort staff to parked cars or other remote areas in at risk situations; perform bag searches; perform locker inspections with appropriate personnel; confront difficult or volatile individuals; and pursue and apprehend disruptive, violent individuals and intruders.

As mentioned above, where parking and parking lots pose a risk, staff should be able to request for security escort to their cars, or other remote, unsecured, at risk areas.

[] ASSESSMENT & ABATEMENT - Workplace Analysis & Follow Through:

An initial, and periodic (at least annually) evaluation will be conducted on the grounds, and on security protocols, to assess the continued and improved effectiveness of this policy. This includes, but is not limited to review of:

- Secluded and remote areas, solitary activities
- Sufficient and operational lighting, fencing, monitoring, lock
- Evening and night shifts
- Routes of access/egress, parking lots/areas and safe access to them
- Employee screening protocols
- Termination protocols
- Employee training
- Effectiveness of reception area to properly screen and retain visitors
- Rapport with local police in sharing information
- Effectiveness in handling difficult and at-risk visitors, etc.

The following questions are taken from the *Comprehensive Health & Safety Checklist for Long Term Care* section on *Security* in Section F of this manual:

1) Are security risks considered in the work site analysis?

2) Is there adequate lighting in remote areas outside and inside the facility?

3) Are TV monitors available to survey obscured areas?

4) Do staff, especially 'at-risk' staff (night and early shifts), receive training on handling potentially disruptive situations and victim-avoidance techniques?

5) Is the parking lot secure?

6) Are measures taken to minimize theft and robbery both within and immediately outside the facility?

7) Are all persons entering and exiting the facility properly identified and documented, including their business at the facility?

8) Is there a thorough criminal and drug abuse pre-employment screening?

9) Is the level of security at the facility compatible with the surrounding community's crime level and experience?

10) If necessary, has a silent alarm system been considered or installed?

11) If necessary, does the facility have a liaison, relationship or communiqué with the local Police Dept.?

12) Does the facility have adequate security personnel, especially during the night and evening shifts?

[] TRAINING:

Employees are trained during orientation and annual Security Training about workplace violence prevention policies, and proper protocols.