Workplace Violence Prevention and Crisis Response Plan

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Section I: Scope

The North Shore Elder Services (NSES) Workplace Violence Prevention and Crisis Response Plan is consistent with 101 CMR 19.00, in establishing zero tolerance for workplace violence, while recognizing that exposure to threats or violence from the public at large, is an unavoidable component of certain occupations. These guidelines apply to all programs licensed, certified, operated or funded by a department or division of Executive Office of Health and Human Services (EOHHS) or that provide direct services to clients.

Section II: Purpose

This plan is intended to be an overview guide for all NSES employees that explains what workplace violence is and provides tools and resources for preventing or responding to workplace incidents. It does not establish policy or regulations on workplace violence but rather serves to educate employees on the issue.

This plan is designed to be supplemented with agency-specific information dealing with situations and circumstances unique to the agency’s environment and mission. Due to the widely varying mission areas within NSES, individual departments have their own mechanisms and operating procedures for dealing with workplace violence situations, and they will provide them to their employees. A copy of the current plan will be provided to any employee upon request, and is available at X:\Office and HR Forms and Policies and on the Staff Resources page at www.nsellder.org, where all employees can readily access it.

While it is everyone’s responsibility to be alert for and to report potential workplace violence problems, supervisors and managers have added responsibilities for prevention, assessment, reporting, and response. This plan does not address in detail those added responsibilities, since department heads will provide the specific training necessary for their own managers and supervisors.

Remember that it is NSES’s policy that every consumer and employee be treated fairly and equitably, with dignity and respect. This policy applies not only to how you as an employee should act, but also to how you deserve to be treated by others. There is no room or tolerance for harassing, threatening, or violent behavior at NSES.

Section III: What is Workplace Violence

Workplace violence can be any act of violence, against persons or property, threats, intimidation, harassment, or other inappropriate, disruptive behavior that causes fear for personal safety at the work site. Workplace violence can affect or involve employees, consumers, visitors, contractors, and other non-employees.
A number of different actions in the work environment can trigger or cause workplace violence (i.e., anger over disciplinary actions or the loss of a job, resistance by a consumer to regulatory actions, a member of the public that disagrees with NSES policy or practices, etc). It may even be the result of non-work-related situations such as domestic violence, “road rage,” or hate incidents or crime (i.e., violence of intolerance and bigotry, intended to hurt and intimidate someone because of their race, ethnicity, national origin, religion, sexual orientation, or disability.

Workplace violence can be inflicted by an abusive employee, a manager, supervisor, co-worker, consumer, family member, or even a stranger. Whatever the cause or whoever the perpetrator, workplace violence is not to be accepted or tolerated.

There is no sure way to predict human behavior and, while there may be warning signs, there is no specific profile of a potentially dangerous individual. The best prevention comes from identifying any problems early and dealing with them. NSES has an Employee Assistance Program (EAP) in place which serves as an excellent, confidential resource available to all employees to help them identify and deal with problems.

**Section IV: Responsibilities**

It is up to each employee to help make NSES a safe workplace for all of us. The expectation is that each employee will treat all other employees, as well as consumers and potential consumers of NSES’s programs, with dignity and respect. You can and should expect management to care about your safety and to provide as safe a working environment as possible by having preventive measures in place and, if necessary, by dealing immediately with threatening or potentially violent situations which occur.

Because NSES programs touch the lives of so many persons, you can expect at some point to encounter individuals who don’t share NSES’s core ethic of fairness, dignity, and respect. There are appropriate and effective ways to deal with such persons to avoid or minimize the damage they seek to cause, and we all need to educate ourselves on those methods. In addition, supervisors and managers have the obligation to deal with inappropriate behavior by their employees and consumers, to provide employees with information about specific department protocols, and the agency is responsible for providing training to employees on workplace violence, and ensuring effective security measures in place.

**Section V: Prevention of Workplace Violence**

**Pre-Employment Screening**

Pre-employment screening techniques, such as interview questions, reference checks, and background checks (i.e. Office of Inspector General of the U.S. Department of Health & Human Services, System for Award Management (SAM), and Commonwealth of Massachusetts and the
Massachusetts Department of Criminal Justice Information Services) are utilized consistent with State and Federal laws and regulations.

**Security**

NSES uses a variety of ways to help ensure safety, such as employee identification badges, individual coded key cards for access to office areas, the “Rose White” Safety Page, emergency evacuation procedures, etc.

**Awareness/Training**

One of the most critical components of any prevention program is training. NSES uses the Human Service Worker Safety Training developed by EOHHS. The training aims to educate human service workers about workplace violence and ways to reduce the risks of violence, including early recognition of individuals at risk of perpetrating workplace violence. Training objectives include:

- Definitions of Human Service Worker, Workplace and Workplace Violence
- Importance of Human Service Worker safety education
- Risk assessment techniques
- De-escalation strategies
- Connections between actions and reactions
- Pertinent laws and regulations
- Contents and location of Workplace Violence Prevention and Crisis Response Plan
- Identification of resources for victims and perpetrators of workplace violence, and additional resources on human worker safety

NSES requires new employees to participate in Human Service Worker Safety Training within the first three months of employment. All employees must participate in this training at least once every two years. A written record of participation is maintained by Human Resources.

**Section VI: Identifying Potentially Violent Situations**

If you ever have concerns about a situation which may turn violent, alert your supervisor immediately and follow the specific reporting procedures provided by your agency. It is better to err on the side of safety than to risk having a situation escalate.

The following are some warning indicators of potential workplace violence:

- Intimidating, harassing, bullying, belligerent, or other inappropriate and aggressive behavior.
- Numerous conflicts with consumers, co-workers, or supervisors.
• Bringing a weapon to the workplace, making inappropriate references to guns, or making idle threats about using a weapon to harm someone.
• Statements showing fascination with incidents of workplace violence, statements indicating approval of the use of violence to resolve a problem, or statements indicating identification with perpetrators of workplace homicides.
• Statements indicating desperation (over family, financial, and other personal problems) to the point of contemplating suicide.
• Direct or veiled threats of harm.
• Substance abuse.
• Extreme changes in normal behaviors.
• Hostile language or threats against a person or a group based on race, sex, religion, disability, ethnic background, or sexual orientation.

Section VII: Responding to Violent Incidents

Reporting Acts of Workplace Violence

Once you have been subjected to or threatened with violence, or become aware of another individual who has been subjected to or threatened with violence you must immediately report this information to a supervisor, manager, or Human Resources. Any reported threat will also be brought to the attention of the Executive Director.

Imminent Danger

If you or any employee is in imminent danger, immediately dial 911 and notify the receptionist as soon as possible.

“Rose White” Safety Page

Any employee may make the “Rose White” Safety Page if they have a personal safety concern while in the office. The goal is to provide a quick and appropriate response, while avoiding undue staff disruption and exacerbating the situation.

• Receptionists will use the “All Page” button to page the entire office area.
• All other staff can page by dialing 701 and then 0 for group number.

First responders will attempt to deal with the situation quietly and respectfully, enlisting help as needed. If a responder sees that the situation is being taken care of, just walk through. If additional responders are needed, the Safety Page should be repeated.
First Responders:
1. Kyle Ciarametaro, Protective Services Worker
2. Michelle Cohn, Human Resources Manager
3. Cheryl Krisko, Chief Program Officer
4. Lucy McKinnon, Program Manager for Long Term Services and Support

Back-Up Responders:
1. Amanda Cannella, Nurse Manager
2. Paul Lanzikos, Executive Director
3. Candace Waldron, Protective Services Manager
4. Supervisor on Call

Non-Responders: Staff who are not on the list of responders should remain at their desks. Non responders should avoid walking through the area during this time. If someone has an appointment or otherwise needs to leave the building, s/he should wait until the “All Clear” page.

Upon Resolution of Situation: Once the situation has been resolved, the receptionist will page “Rose White All Clear”.

Response to Incident of Workplace Violence

In response to an incident of workplace violence, both immediate crisis response and follow-up measures, such as investigation, retraining, mediation, or disciplinary action will be implemented.

Investigations are conducted in a fair and expeditious manner. The Agency’s designated representative will conduct a good faith investigation of workplace incidents. Identities of the reporting party, witnesses, and the individual/s alleged to have violated the law or Agency policies or practices will be protected to the extent possible, however the Agency cannot promise confidentiality. Identities of those involved in an investigation will be revealed on a need to know basis only. At the conclusion of an investigation, to the extent appropriate, the reporter and other parties will be informed of the final outcome.

Employees are expected to cooperate fully in investigations that the Agency may undertake. Refusing to cooperate or impeding an investigation may result in discipline up to and including termination.

Disciplinary Action

If the agency determines that workplace violence has occurred, the company will take all appropriate action it deems necessary and appropriate. Such action may include, but is not limited to:
• Suspension, termination or other disciplinary action as appropriate.
• Removal from the premises or withdrawal of consent to enter or be present on the premises pending the outcome of an investigation and thereafter, if required.
• Notification of security and law enforcement agencies of any threats and violent acts, and initiation of criminal arrests and prosecutions.
• Termination of any business relationship.
• Any other action the Agency deems to be necessary or required under the circumstances.

Non-Retaliation Policy

No employee, supervisor, or manager shall be retaliated or discriminated against for making a complaint in good faith, or for assisting or cooperating in the investigation of a report of workplace violence. Such retaliation or discrimination is unlawful and will not be tolerated. All reports of workplace violence will be taken seriously and will be thoroughly investigated.

An employee who intentionally files a false report of workplace violence will be subject to discipline up to and including termination.

Recording Reported Incidents of Workplace Violence

The Human Resources Department maintains an electronic Investigation Log that tracks all data relevant to incidents of workplace violence against human service workers. Data includes the date reported, names of the involved parties, date and location of incident, description of incident, nature of any injuries, name of investigator, date investigated and results of investigation. The contents of the Investigation Log are confidential to the extent permitted by law.

Resources for Victims and Perpetrators

North Shore Elder Services provides the GuidanceResources® Program EAP Business ClassSM to all employees. Every victim or perpetrator is referred to the confidential counseling provided in this program. An employee who believes that they may have a problem that could lead to violent behavior is encouraged to be proactive in using this resource. For further information regarding this program, please contact Human Resources.

877.595.5281 | TDD: 800.697.0353
www.guidanceresources.com
NSES Company Web ID: EAPBusiness
Section VIII: Annual Review and Risk Mitigation Policies

North Shore Elder Services reviews the Workplace Violence Prevention and Crisis Response Plan on an annual basis. The review looks at all reported incidents and measures taken, and modifies the plan for improvements. If risks are identified during the review of historical data or a threat assessment resulting from program changes (i.e. changes in client demographics, increased volume of clients, new programs or protocols, etc.) prevention methods will be identified and implemented to reduce potential risks.

Section IV: EOHHS Reporting

Upon EOHHS request, North Shore Elder Services will report our compliance with 101 CMR 19.00, including the Workplace Violence Prevention and Crisis response Plan described in 101 CMR 19.04.