

# WHITE SANDS TREATMENT POLICY AND PROCEDURES

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|--------------------------------------------------------|-------------------------------------|
| TITLE:<br><b>WORKPLACE VIOLENCE PREVENTION PROGRAM</b> | NUMBER<br><b>RM-1:006</b>           |
| SUBJECT<br><b>SAFETY RISK MANAGEMENT</b>               | EFFECTIVE DATE<br><b>06/15/2024</b> |
| REVIEW, REVISION, AND APPROVAL DATES<br><b>06/2024</b> | PAGE(S)<br><b>1 OF 7</b>            |

## PURPOSE:

This policy provides all staff members with direction, resources, training, education, and the support required in the successful implementation and continued maintenance of White Sands Treatment's Workplace Violence Prevention Program. The Joint Commission defines workplace violence as *an act or threat occurring at the workplace that can include any of the following: verbal, nonverbal, written, or physical aggression; threatening, intimidating, harassing, or humiliating words or actions; bullying; sabotage; sexual harassment; physical assaults; or other behaviors of concern involving staff, licensed practitioners, patients, or visitors.*

## SCOPE:

This policy applies to all employees of White Sands.

## RESPONSIBILITY:

It is the responsibility of the CEO and/or designee to implement this policy and procedures and the responsibility of each departmental director to disseminate this information to all employees they supervise.

## POLICY:

It is the policy and commitment of White Sands Treatment to promote and maintain an environment of safety and quality for individuals receiving treatment, visitors, and employees, where all forms of workplace harassment, violence, and discrimination are not tolerated. White Sands' Workplace Violence Prevention Program reduces or eliminates the risks of violence, threats of violence, harassment, intimidation, environment of care hazards, and other factors that could potentially disrupt the treatment environment. The program is maintained through the provision of employee education and training at all levels of employment, effective communication, written policies and procedures, consistent incident reporting, proactively identifying and resolving environmental risk factors, data collection and analysis, support, leadership, and oversight. Every White Sands Treatment employee is responsible for maintaining a safe environment within their role.

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## 1. TYPES OF WORKPLACE VIOLENCE:

### **Type 1: Violence by Strangers**

This is violence committed by an assailant who has no legitimate business relationship to the workplace or the worker. For example, the person enters the workplace to commit a robbery or other criminal act. Workplaces at risk of violence by strangers commonly include late night retail establishments and taxi cabs.

### **Type 2: Violence by Customers or Clients**

This is violence committed by an assailant who either receives services from or is under the custodial supervision of the affected workplace or the victim. Assailants can be current or former customers or clients such as passengers, patients, students, inmates, criminal suspects or prisoners. The workers typically provide direct services to the public, for example, municipal bus or railway drivers, health care and social service providers, teachers and sales personnel. Law enforcement personnel are also at risk of assault from individuals over whom they exert custodial supervision. Violence by customers or clients may occur daily in certain industries; they represent most non-fatal injuries related to workplace violence nationwide.

### **Type 3: Violence by Co-workers**

This involves violence by an assailant who has some employment related involvement with the workplace, for example, a current or former employee, supervisor, or manager. Any workplace can be at risk of violence by a co-worker. In committing a threat or assault, the individual may be seeking revenge for what is perceived as unfair treatment. Fatalities related to violence by co-workers have received much media attention, but account for only a small proportion of all workplace violence related fatalities. Strangers cause most workplace violence fatalities.

### **Type 4: Violence by Personal Relations**

This includes incidents of domestic violence at the workplace by an assailant who confronts an individual with whom he or she has or had a personal relationship outside of work. Personal relations include a current or former spouse, lover, relative, friend or acquaintance. The assailant's actions are motivated by perceived difficulties in the relationship or by psycho-social factors that are specific to the assailant.

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## 2. GENERAL RISK FACTORS

General risk factors only represent the potential for an increased likelihood of violence, they do not guarantee that violence will occur or that incidents will increase. However, the presence of the following risk factors, and several in combination, may increase the potential for workplace violence.

- a. Contact with the public
- b. Exchange of money
- c. Delivery of passengers, goods, or services
- d. A mobile workplace such as a taxicab or police cruiser
- e. Social services or criminal justice settings-working with unstable or volatile people in healthcare
- f. Working in isolation
- g. Working late night/early morning hours
- h. Working in high-crime areas
- i. Guarding valuable property or possessions
- j. Working in community-based settings

## 3. PROCEDURES:

### a. Workplace Violence Prevention Program Components

As a member of White Sands Treatment's leadership team, the Director of Quality Assurance, Performance Improvement and Risk Management is assigned the role of leading the Workplace Violence Prevention Program. The following components are key to the successful development and maintenance of this program:

- (1) Policies and procedures that address workplace violence prevention and response. Please see *Appendix A*.
- (2) Reporting workplace violence incidents both verbally to supervisors and in writing using the current Incident Report of Unusual Occurrences. Please see *Appendix B*.
- (3) Analyzing and trending data related to workplace violence occurrences. The data analysis will be reported and discussed monthly during the Quality Assurance Performance Improvement Committee meeting.
- (4) Providing follow-up services and support to individuals who witness and for individuals who are victims of an act/acts of workplace violence. The follow-up care and support may include counseling and trauma informed care and psychological counseling. Please see *Appendix C*.
- (5) Ensuring that the leadership team and the governing board of White Sands remain informed of all incidents of workplace violence; this will assist them in determining if the program is effective or if more resources are needed. The information is provided to the leadership team at least monthly during the QAPI Committee meeting and to the governing board at least quarterly.

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- (6) Involving individuals employed by White Sands to serve on the Workplace Violence Prevention and Awareness Team. Members of the team range from direct care staff (e.g., BHTs, nurses, therapists), leadership, Environment of Care, and ancillary staff.

**b. Environment of Care Functions in the Workplace Violence Prevention Program**

- (1) Monthly safety, security & infection control rounds of the entire facility are completed to identify potential and existing environmental hazards, damages to the property and to identify potential and existing safety and security issues involving staff, patients, and visitors, including those related to workplace violence. All findings are reported monthly in the QAPI Committee meeting and to the committee members of the Workplace Violence Prevention Program. Please see *Appendix D*.
- (2) Quarterly disaster drills addressing potential workplace violence such as, *Weapon(s) on the premises, Bomb threat, Staff/security assistance-Psychiatric emergency, and Hazardous material spill or leak* are completed, reviewed, and reported in the QAPI Committee meeting and to the committee members of the Workplace Violence Prevention Program. Please see *Appendix E*.
- (3) Monthly fire drills are completed on all shifts and reported in the QAPI Committee meeting and to the committee members of the Workplace Violence Prevention Program.
- (4) Proactive Risk Assessments are completed annually, or more frequently if physical changes have been made to the facility.
- (5) Facility Maintenance Requests are submitted by staff electronically; all maintenance requests are resolved within 24-48 hours.

**c. Human Resources' Role in the Workplace Violence Prevention Program**

- (1) Local and national background screening, with signed consent, is completed for each potential employee of White Sands Treatment. White Sands, in compliance with the Department of Children and Families' Licensing Standards for Substance Abuse Services, prohibits hiring individuals who have been convicted of violent crimes, including those crimes that are sexual in nature.
- (2) Provides education, training, and resources as related to the Workplace Violence Prevention Program, on the following topics at the time of hire:
 

|                                            |                                |
|--------------------------------------------|--------------------------------|
| -Abuse and Neglect Reporting               | -Co-occurring Disorders        |
| -Cultural Diversity                        | -Workplace Violence Prevention |
| -Verbal De-escalation & Aggression Control | -Patient Rights                |
| -Risk Management-Incident Reporting        | -Domestic Violence             |
| -Sexual Harassment                         | -Suicide Risk & Prevention     |

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Provides the following education, training, and resources as related to the Workplace Violence Prevention Program, annually and any time there are changes made to the Workplace Violence Prevention Program:

- Suicide Risk & Prevention
- Cultural Diversity
- Verbal De-escalation & Aggression Control
- Domestic Violence
- Workplace Violence Prevention

- (3) Training is provided for all employees, including licensed practitioners and White Sands' leadership, at the time of hire, annually, and any time there are changes made to the Workplace Violence Prevention Program. The training, education, and resources address the following:

i. **Recognition-Warning Signs of Potential Workplace Violence**

- Excessive or unusual absenteeism
- Deterioration in hygiene/appearance
- Anti-social behavior
- Direct/indirect threats of harm
- Signs of chronic depression
- Mood swings & lack of impulse control
- Sudden angry outbursts
- Unwilling to conform to procedural changes
- Blaming others for mistakes
- Obsessive involvement with the job
- Substance abuse
- Comments about suicide
- Domestic problems in personal life
- Disciplined or terminated employees

ii. **Prevention**

- Worksite analysis and hazard identification, prevention and control
- Employees wear Identification badges at all times.
- Complete disaster and fire drills regularly
- Do not ignore bad/odd behavior, report it
- Treat all patients, visitors, and staff with dignity and respect
- Enforce all policies and procedures, especially those pertaining to the Workplace Violence Prevention Program, including White Sands Code of Ethics, Sexual Harassment, and Drug-Free Workplace policies.
- Complete the Workplace Violence Prevention & Awareness training
- Report all verbal, nonverbal, written threats, or physical aggression; threatening, intimidating, harassing, or humiliating words or actions; bullying; sabotage; sexual harassment; physical assaults; or other behaviors of concern involving staff, licensed practitioners, patients, or visitors to your supervisor, Human Resources personnel, a member of the leadership team, or to the Quality Assurance/Risk Management Director.

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- Ensure locked doors remain closed and locked
- Complete searches of patients and patients' belongings at the time of admission; remove all contraband
- All new admissions and visitors must complete a full body scan before entering the facility
- Ensure patients' complaints/grievances are addressed and resolved
- Place an *Alert* on patients' charts who have been identified as having a history of violence.
- Change access code to locked doors frequently
- Video monitoring inside and outside throughout the facility

iii.

## **Response**

- Remain calm, and act immediately
- Call a **Code Grey** over the two-way radio
- Staff will move patients to a safe location away from the occurring incident
- Utilize verbal de-escalation and aggression control techniques
- Call 9-1-1 if the situation requires police involvement
- Provide post-incident support and counseling, this may include trauma counseling, for victims and witnesses of workplace violence
- A team comprised of leadership, staff, and licensed practitioners shall investigate the incident and complete a Root Cause Analysis to identify causes, track trends, extract lessons learned, and identify necessary changes needed to improve the program. This information will be reported to White Sands' leadership and the governing board.
- Report the incident of violence to a supervisor, Human Resources personnel, a member of the leadership team, or to the Quality Assurance/Risk Management Director.
- Complete an Incident Report (Please see policies RM-1:001 & RM-1:002)
- Make required notifications to licensing and accreditation agencies

d.

## **Leadership's Role in the Workplace Violence Prevention Program**

- (1) Promote and maintain a culture of safety and quality organization-wide by making provision for the education, training, and resources to all employees of White Sands Treatment.

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- (2) Provide support and guidance in the implementation and maintenance of the Workplace Violence Prevention Program by:
- i. designating an individual to lead the Workplace Violence Prevention Program who will further develop the program with a multidisciplinary team.
  - ii. providing support to victims and witnesses of workplace violence including counseling and trauma-informed counseling, if needed.
  - iii. reviewing, revising, and approving policies and procedures to identify, prevent, and respond to workplace violence.
  - iv. reviewing, revising, and approving the process by which incidents of workplace violence are reported.
  - v. ensuring the data is analyzed, trends are identified, and the information is reported to the governing board.
  - vi. providing support and direction in the assessment of the program at least annually, to determine the effectiveness of the Workplace Violence Prevention Program and if additional resources are needed.

# **WHITE SANDS TREATMENT POLICY AND PROCEDURES POLICY APPENDICES**

- Appendix A** Policies that address workplace violence:  
**Drug Free Workplace**  
**Sexual Harassment**  
**Employee Code of Ethics**  
**Employee Criminal Background Checks & Convictions**
- Appendix B** Incident Report Form
- Appendix C** Follow up Support-Psychological and Trauma Informed Counselors
- Appendix D** Safety, Security and Infection Control Monthly Rounds Checklist Form
- Appendix E** Disaster Drill Evaluation and Disaster Codes  
**Code Blue**-Life threatening emergency  
**Code Grey**-Staff/Security Assistance and Psychiatric Emergency  
**Code Red**-Fire  
**Code Yellow**-Hazardous Material Spill or Leak  
**Code D**-Internal or External Disaster (weather, civil disturbance, explosion)  
**Code Green**-Bomb Threat  
**Code Purple**-Weapon(s) on the Premises