

A blue oval sign with a white border is mounted on a blue vertical post. The sign contains the text "Health, Safety & Workplace Violence" in a bold, black, sans-serif font.

***Health, Safety & Workplace
Violence***

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SYMBION

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1.0 PREAMBLE

This policy has been prepared pursuant to the Occupational Safety and Health Act 2007 a copy of which is available in the office. All employees must familiarize themselves with this Act. Article 3 (Applications of the Act) states that.

3 (1) This Act shall apply to all workplaces where any person is at work whether temporarily or permanently.

3 (2) The purpose of this Act is to,

Secure the Safety and Health at workplace or persons at work; and,

- (a) Protect persons other than persons at work against risks to safety and health arising out of or in connection with the activities of persons at work.

Specific Requirements of the Act

Under section 6 (4) of the Act states that every occupier shall sent a copy of a report of risk assessment carried out under this section to the area Occupational Safety and Health Officer.

Under section 6 (6) of the Act it is the duty of every occupier to register his workplace rules such workplace is exempted from registration under the act.

Under section 7 (1) the occupier is to prepare a written statement or policy and bring this to the attention of the staff.

Under section 9 (1) the occupier shall establish a safety and health committee.

Under section 121 (1) keep posted in a prominent location the prescribed abstract of this act.

Employees of Symbion are the company's most valuable asset, and their personal safety is of primary importance. The intent of this program is to achieve and maintain safe and healthful working conditions for all employees. An effective OHS program should:

- Minimize accidents through anticipation and prevention rather than reaction after the fact.
- Depend on employees to have a thorough knowledge of their operations, a sincere safety Consciousness in their workplace, good judgment, and common sense.
- Provide training for all employees to ensure safety awareness and proper work practices.
- Require adherence to all SYMBION safety procedures and practices and The Occupational Safety and Health Act, 2007.

Achieving an excellent safety record depends upon cooperation in all health and safety matters not only between managers and employees but also between employees and their co-workers.

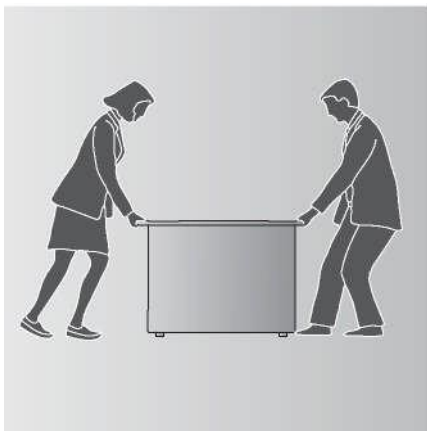
2.0 GENERAL SAFE WORK PRACTICES

2.1 The following work practices are generally applicable to all work areas within SYMBION facilities, and are to be complied with by all SYMBION employees:

- Follow all written health and safety policies and procedures.
- Immediately report all unsafe conditions to the Office Manager.
- Immediately report all accidents, injuries and illnesses to the Office Manager.
- If an emergency situation arises, follow the procedures for reporting emergencies.
- Do not try to extinguish fires unless you have been specifically trained and designated as an "emergency responder."
- Keep aisles and hallways clear at all times.
- Keep floor surfaces clean and dry.
- Smoking is not allowed inside the buildings except in designated areas.
- Keep exits free of obstructions at all times.

2.2 OFFICE AREAS:

These work practices are specifically intended to address the routine duties of office employees.



1. Keep work areas clear of debris, floor storage, and electrical cords.
2. Maintain adequate aisle space to prevent bumping into edges of desks,
3. Open drawers one at a time. Close them right away when finished. Keep hands clear when closing drawers.

4. When carrying heavy objects, care is to be taken to avoid overexertion and back strain.
5. Actively participate in vision and eye care and use the rest periods provided to relax the eyes and body.
6. Use proper chair adjustment, proper screen adjustment, proper body positioning, and adequate rest periods.

3.0 HEALTH AND SAFETY COMMITTEE RESPONSIBILITIES

3.1 GENERAL

The directors are ultimately responsible for establishing SYMBION's Health and Safety Program. They will ensure that team leaders understand the program and maintain it on a day-to-day basis

3.2 FACILITIES AND HUMAN RESOURCES:

The Health and Safety Committee in partnership with the Office Manager is responsible for developing and maintaining the Health and Safety Program and for coordinating and managing its implementation.

3.3 TEAM LEADERS/SUPERVISORS:

Team leaders/Supervisors have responsibility for the health & safety of employees under their supervision. They must ensure that all employees under their direction know and follow safety policies and procedures. Specific responsibilities include:

3.3.1 Ensuring the availability of functional protective equipment, as necessary.

3.3.2 Contacting the Office Manager in the event of any on-the-job employee injury or illness.

3.3.3 Encouraging their staff to report and correct any unsafe work practices.

3.3.4 Reprimanding any employee who does not work in a safe manner or who is unwilling to correct unsafe work practices.

3.4 INDIVIDUAL EMPLOYEES

All employees must be familiar with the Health and Safety Program, know the safety requirements for their specific job tasks, act in a safe manner, and report any unsafe equipment or conditions.

3.4.1 Read and comply with the Health and Safety policy.

- 3.4.2 Use safety equipment in a proper manner and report any defects to their manager and the HR.
- 3.4.3 Report any accidents or injuries, regardless of their severity, to their supervisor/team leader and the Human Resources.
- 3.4.4 Report any unsafe equipment or working conditions to their supervisor/team leader and the Human Resources Department.
- 3.4.5 Report any exposures to hazardous substances to their supervisor/team leader and the Human Resources Department.
- 3.4.6 Attend any required health and safety meetings or training sessions.
- 3.4.7 Refrain from activities that could create additional hazards.
- 3.4.8 Maintain safety consciousness—when in doubt, follow the safest course of action.
- 3.4.9 Practice reasonable health maintenance procedures. The employee must realize that specific personal habits, such as alcohol consumption, smoking, or drug use may heighten the risk of, and harmful effects from exposure to chemicals and may create a hazard to the health and safety of fellow workers.

4.0 PROGRAM COMPLIANCE

4.1 GENERAL

SYMBION will discipline employees who fail to follow safe work practices or continually perform in an unsafe manner.

4.2 DISCIPLINARY ACTIONS

Employees who do not adhere to safe work practices or use personal protective equipment (as needed) are not only at risk of becoming injured, but May also present hazards to co-workers. Depending on the circumstances, such action may include: oral or written warnings, suspension, and/or immediate termination.

4.3 ACCIDENT INVESTIGATIONS

All accidents, injuries, and illnesses that occur at the SYMBION offices must be investigated to determine the cause and provide solutions for the correction of any hazard.

4.4 CORRECTIVE ACTIONS

The Health and Safety Committee will be responsible for ensuring that any unsafe or unhealthy conditions, work practices or work procedures are corrected in a timely manner based on the severity of the hazard.

4.5 POSTING OF WARNINGS AND INFORMATION

Work areas, which contain hazardous materials, will have warning signs posted indicating the hazards. It will provide contact names of individuals responsible for the implementation of the program.

4.6 EMPLOYEE SUGGESTIONS

Employees are encouraged to provide suggestions to improve workplace safety, to advise the management of unrecognized hazards, and to advise the management of unsafe work conditions.

4.7 GENERAL TRAINING

All employees will receive training about different types of emergencies, the proper procedures for reporting emergencies, and planned evacuation routes. In addition, all employees will participate in practice drills as designated by the employer.

4.8 EMERGENCY ACTION PLAN

Regulations require that all employers have a written emergency action plan which addresses anticipated emergencies, including fires, earthquakes, and medical emergencies. The plan must provide the necessary information for employees to safely evacuate the building and describe the actions that employees should take when faced with an emergency situation.

4.9 REPORTING EMERGENCIES:

These are the general guidelines for reporting all emergencies

4.9.1 Contact your local emergency number to alert fire, medical, and others emergency events

4.9.2 Contact your local facility manager and/or your manager

4.10 TYPES OF EMERGENCIES AND ESCAPE PROCEDURES:

Some emergencies that may arise in the workplace include burglary, fire, earthquake, or employee injury or illness. Each of these situations has step-by-step procedures to follow in order to remove the employees from danger or provide assistance when necessary.

4.10.1 ARMED ROBBERY/BURGLARY:

The following procedures should be followed during an armed robbery/burglary:

- Play it safe! Do not be a hero. Cooperate; give up the money and do not resist.
- Even if you cannot see a weapon, assume that there is one.
- Stay calm and cautiously observe as much as possible about the robber. Do not stare as this may aggravate the robber.
- Do not lock the door to keep the robber from leaving.
- A person who feels trapped is more likely to panic and become violent.
- If you do not understand what the robber is telling you to do, ask for clarification.
- Avoid surprises. Keep your hands in sight and do not make any sudden moves.
- Inform the robber if you must reach for something, or if something will make an unexpected noise
- Keep it brief. The longer a robbery takes, the more nervous the robber becomes.
- Keep it smooth. Handle the entire situation as if it were a normal transaction.
- Activate the alarm only after the robber has left or when it is safe to do so

4.10.2 INJURED OR ILL PERSON:

The following procedures should be followed if you come upon a situation or witness a situation in which a person is ill or injured:

- Calmly inform the Office Manager that you have a medical emergency using the procedures outlined above in Reporting Emergencies.
- The Office Manager will also contact local emergency authorities to call for emergency assistance.
- Obtain assistance from others in the office if necessary. If victim is conscious, have bystanders remain outside the victim's field of vision to avoid embarrassing the victim.
- If the area is safe, have someone stay with the victim at all times to monitor his or her condition, and to reassure him or her that medical assistance is on its way.
- Send a reliable person to meet the Fire Department and Paramedics at the kerb and escort them to the victim.

4.10.3 FIRES, SMOKE OR FUMES

The following procedures should be followed if you notice fire smoke or fumes near in the building:

- Move to a safe area.
- Notify Facilities of the location and type of fire if known using the procedures outlined in Reporting Emergencies.
- Proceed directly to the nearest exit.

4.10.4 EARTHQUAKE:

The following procedures should be followed if an earthquake occurs:

- Immediately "duck and cover" when you feel the building shaking.
- Move away from windows.
- Take shelter under a tabletop or desk.
- Do not run outside during the shaking.
- If you are in a hallway, crouch against the nearest wall.
- If you are outdoors, move away from things that can fall on you, such as overhead wires, tree branches, and glass from windows, etc.
- Expect aftershocks! They can be as severe as the initial shaking and may cause additional damage.
- Wait for instruction from Facilities before leaving shelter.

4.11 EVACUATION:

4.11.1 At SYMBION offices, Fire Marshalls will coordinate the evacuation of the building as per the evacuation plans outlined in the office. Symbion employees should familiarize themselves with the evacuation plans in each of the wings of the building when they arrive. The evacuation plans identify all of the exits as well as the evacuation routes for each area of the building. The plans also identify the fire extinguishers, fire alarm pull stations, fire hoses, and evacuation assembly points.

4.11.2 The following issues need to be considered when planning an evacuation procedure for disabled people:

- Identify the number of disabled staff and students and where they will be in the building
- Implement Personal Emergency Evacuation Plans. The PEEP will also record the safety plan e.g. routes, corridors, stairs or refuges etc, identify those persons who will assist and any training or practice needs. The Safety Committee must produce a PEEP when aware that staff, students or visitors may experience difficulties in responding to a building emergency evacuation alarm.
- Consider the characteristics of the building
- Assess the evacuation equipment disabled people will need
- Train you staff to deal with emergency evacuations
- Determine what needs to happen when the alarm goes off
- Identify what needs to be done when it is not possible to evacuate disabled people

4.11.3 THE FOLLOWING PROCEDURES SHOULD BE FOLLOWED IF THERE IS A NEED TO EVACUATE THE BUILDING

- When the alarm sounds, evacuate immediately. Do not return to your desk for belongs or any other reason. Leave the building and go to the designated meeting place.
- Assist those who cannot leave rapidly on their own.
- Calmly inform others in work areas near you, if they have not been informed.
- Adjust to the location of smoke or fumes if there is a fire. Heat and flames will rise towards the ceiling so stay close to the floor. Breathe through a wet handkerchief or similar cloth if available.
- Proceed directly to the nearest exit.

- Staff and students with a visual impairment may be guided on level surfaces by taking someone's arm and following. On stairways the guide should descend first and the person following can then place their hand on the guide's shoulder. If a member of staff or visitor is a guide dog user they should be asked about how/if they can be assisted. Many disabled people will be able to descend (or ascend) a stairway, however others may need assistance. There is equipment available for safely transporting people with mobility impairments in stairways. This type of equipment should be given serious consideration especially in high-rise buildings.

4.12 RESCUE AND MEDICAL DUTIES:

SYMBION will have a group of volunteers who will be trained in first aid will be available to assist in the rescue and medical assistance in emergency situations. They will respond when an employee has been injured or has become ill.

The Following are emergency contact numbers:

- FIRE: Knight Support Ltd. 882920/1 Mobile 0728-999990
Fire Brigade – 256 (414)342223 Or 999

MEDICAL: AAR - Nairobi 2717374/5/6 Mombasa 41 312405/6
UAP Old Mutual - Kampala 256 (41) 322704/0800132700

- SECURITY:
 - Karen Police - 882538/53
 - Ultimate Security Ltd - 875475/95; 3872468
Mobile 0733 778 4140 | 0733 736 376 | 0722 753 664 | 0722 822 856
 - Security Guards Services Ltd. – 3876224 | 3872468
Mobile 0735 720 782 | 0722 822 85
 - Security Group Uganda Ltd – 256 (414)114400

4.13 DO'S AND DON'TS DURING EVACUATIONS

- Follow SYMBION's procedures for evacuating the building.
- Try to remain calm. Do Not Panic!
- Immediately leave the building. Do not go back for personal belongings.
- Move towards the closest exit quickly.
- Go directly to the assigned meeting place.
- Do not attempt to re-enter the building until Emergency personnel have designated that the building is safe to enter.

Do maintain all exits free of all obstructions or impediments to full instant use in the case of fire or other emergency.

4.14 DO'S AND DON'TS DURING MEDICAL EMERGENCIES

- Follow SYMBION's procedures for medical emergencies.
- Do not attempt to move the victim until a paramedic has arrived unless it is unsafe to remain in the area.
- Stay clear of the emergency area.

5.0 DOCUMENTATION AND RECORD KEEPING

5.1 General

The documentation of the Health and Safety Program is extremely important. Written records are the best method to provide proof that the program elements are being implemented according to the regulations. Records will be maintained by the Health and Safety Committee, and Human Resource

5.2 ACTION POINTS:

- A Health and Safety Committee has been set up
- Develop Risk Assessment for office
- Develop health and safety checklist for each job category – CADD, Administration, Grounds staff, Print room (samples attached)
- Staff training on the Policy

Employer to provide and facilitate information, training and supervision so that employees can perform their work in a safe manner. Training should provide employees and their supervisors with an understanding of:

- health and safety legal responsibilities.
- the nature of the hazards in the workplace.
- the process of hazard identification, risk assessment and risk control.
- the arrangements for reporting.
- circumstances likely to cause hazards.
- the reasons for and safe use of the risk control measures in place in the workplace, and safe work practice

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Workplace Violence Prevention

1.0 INTRODUCTION

Workplace violence is any violent act that occurs in the workplace and creates a hostile work environment that affects employees' physical or psychological well-being. Violence at work can take many forms: harassment, intimidation, threats, theft, stalking, assault, arson, sabotage, bombing, hostage taking, kidnapping, extortion, suicide, and homicide. One thing that these many types of workplace violence have in common is that the perpetrator believes he or she is gaining "control" or "getting even" with some person or entity. Violence is more likely in workplaces where workers exchange money, work alone at night, handle valuable items, work as public-safety employees, work in a high-crime area, or work with those who may become violent. But all workplaces, regardless of size or type of business, have the potential for violence. Across the nation, violence in the workplace has become a significant occupational hazard. It may come from outside the workplace or from within:

- The person causing the violence may have no legitimate relationship to the workplace. For example, he or she may enter a workplace to commit a robbery; during the robbery attempt, he or she shoots an employee or customer.
- Someone who receives or has received a service provided by the workplace may commit violence. This may be a client, customer, patient, or student.
- A person who has a connection to the workplace may commit violence. He or she may be a current or former employee or have a relationship to a current or former employee. Domestic violence played out at work which may include assault or even homicide – fits into this category, but so do other physical and verbal assaults, threats, intimidation, and other types of harassment.

Rampage killings by former employees or former lovers or spouses of employees come to mind when we think of workplace violence and certainly, the threat of this type of crime is real; however, recent statistics show that only about one percent of the workplace crimes committed nationwide fall into this category. Sexual harassment, threats, intimidation, and other physical and verbal assaults are far more common and expensive to employers than such dramatic examples of workplace violence. Even one violent incident in the workplace can prove extremely expensive for a business.

Costs can include medical care, liability suits, legal fees, management costs, lost business and productivity, repairs and cleanup, higher insurance rates, consultant fees, increased security measures, and the death or injury of valued employees. Various reports show that American businesses spend as much as \$30 billion a year on workplace-violence injuries and other costs related to workplace violence.

2.0 WHAT CAUSES WORKPLACE VIOLENCE?

Violence in the workplace is complex. Factors that can cause workplace violence to erupt include alcohol and drug abuse; financial crises related to job loss, gambling, bad investments, or credit-card debt; and mental illnesses that have a wide variety of causes. Emotional strain and mental illness lessen a person's ability to cope with difficulties such as family or relationship problems or mistreatment (real or perceived) by others. Combinations of factors such as these can cause more stress, anger, fear, or despair than an individual may be able to handle in a manner less harmful and more appropriate than violence.

3.0 DEVELOPING A WORKPLACE VIOLENCE PROGRAM

By assessing your company's situation and developing a workplace violence-prevention program, you can reduce the risk of violence in your workplace and reduce the potential for liability should violence occur. A workplace violence-prevention program should be customized to suit your particular workplace. In developing a workplace violence-prevention program, you will need to take most, if not all of the following actions:

3.1 Form the committee that will develop the program:

Your workplace violence-prevention program should be developed and implemented in cooperation with your workplace safety and health committee or, if there is no committee, with the assistance of workers knowledgeable about your worksite. The written portion of the program should become part of your company's overall health and safety program.

3.2 Conduct a risk assessment:

Your organization's workplace violence-prevention program should be based on the results of a risk assessment, during which you will evaluate the risks of workplace violence and the strengths and weaknesses of your existing policies. Assess your organization's potential for violence by:

- Examining past incidents
- Reviewing your injury log
- Surveying your safety and health committee and workers at all levels regarding violent incidents, reported or not

If you know where violence is likely to occur and what types of violence have occurred, you'll be able to prevent future incidents through the policies, procedures, and training that make up your program. Conduct a security survey. Determine whether modifications to your current security measures are needed. Examples of precautions that may be suitable:

- Limiting access by former employees to the workplace
- Requiring visitors to sign in and out at reception, wear identification badges, or be escorted.
- Increasing parking lot illumination or providing escorts and/or guards
- Locking doors that lead from reception areas to work areas
- Adding surveillance cameras, panic buttons, or metal detectors

Not every organization wants or needs surveillance cameras or metal detectors. Violence may best be prevented by appropriate workplace security measures and caring for the people who work in your organization through an employee-assistance program, adequate training, and a system for reporting and following up on incidents.

3.3 Develop your written policy:

Your written policy should state your approach to preventing incidents of violence and outline the duties and responsibilities of management. Your written policy tells employees that your company has **no tolerance** for violence including threats, harassment, intimidation, substance abuse, and weapons possession. It tells them what behavior is unacceptable in the workplace and what disciplinary actions will be taken if rules are not followed.

3.4 Review pre-employment screening:

In the written plan, include procedures for pre-employment screening that have worked well for your company, for other companies, or that you believe to be prudent. You will have the opportunity to fine-tune these procedures in reviews of your workplace violence-prevention plan. Hiring the right person, no matter what the position within your organization, is an important step in preventing workplace violence. The more attention paid to the hiring process, the less risk of violence within your workforce. Consider these steps as part of your plan:

- Check all work history statements made on job applications. This can be done internally or by an outside service.
- Develop open-ended job interview questions that help your interview team make the most thorough assessments of candidates possible.
- Have an experienced interviewer or team conduct two interviews of every applicant, including those for entry-level jobs.
- Develop a screening system that is equitable, that allows your organization to weigh potential liability, and that has the approval of your legal counsel.
- Use drug screening to the extent practicable.
- Screen contract personnel assigned to work at your facility. Vendors should certify that those individuals meet your safety and security requirements.
- Conversely, if you assign contract workers to other organizations, consider their safety and security requirements.

3.5 Review termination and layoff procedures:

Not all individuals distraught about job termination or layoff become violent; however, firings *are* the cause of most of the rampage attacks that occur in the workplace.

- Human resources personnel and managers should be trained to identify potential problems among workers, administer discipline as necessary, and terminate employees without causing the terminated employee to feel that the loss of this job is the “end of the line.”
- Employee assistance counseling and out-placement services can help employees facing termination for whatever reason.
- Conduct exit interviews when employees retire, quit, or are transferred or terminated. Identify potential violence-related problems. If you provide a confidential employee assistance program, encourage employees, supervisors, and managers to use these services.

3.6 Write rules for acceptable behavior and rules for discipline:

Organizations must tell employees exactly what is expected of them.

- Adopt a policy of **zero tolerance** to threats and acts of violence.
- Prohibit use or possession, or being under the influence, of alcohol or drugs at the worksite.
- Prohibit the possession of weapons among employees or visitors, unless they are authorized by your organization.
- Set up a method for employees to anonymously report concerns about a co-worker’s abnormal behavior or violations of your violence-prevention policies to a contact person. Employees must be able to use this method without fear of reprisal or criticism.

Your rules of behavior will mean little unless you develop fair methods of discipline that your personnel department, supervisors, or risk and safety officer will enforce consistently throughout the workforce. Discipline should be *positive not punitive* to the extent possible. If you require and expect employees to report signs of trouble or threats of violence, your employees must know that the person they've reported is receiving help. If termination is the only answer in a particular situation, ensure that it is done in an appropriate setting, without rancor on the part of the management representative. Ensure that exit interviews are conducted, and that counseling and out-placement services are offered, if that is part of your company's policy.

3.7 Write rules for acceptable behavior and rules for discipline:

To make your workplace violence-prevention plan effective, employees at all levels must know about the potential for violence in the workplace and be aware of and understand your organization's policies and procedures. Support from the highest level is the first step. If your top executives have participated on the workplace violence-prevention plan committee from the start, they are more likely to be familiar with and supportive of all phases of your plan. If top executives have not served on the committee, your first training session should be directed to them.

- Train managers and supervisors how to deal with employee layoffs, job terminations, and discipline; how to assess the violence potential of individuals; and how to take appropriate measures, such as arranging security.
- Train supervisors and workers in violence prevention, your company's security procedures, and response procedures.
- Maintain training records.
- Ensure that all new employees read and understand your policies and procedures, and have all employees review them regularly.
- Train supervisors and managers to address problems and conflict promptly. Situations rarely resolve themselves without help.
- Provide conflict-resolution training to your employees. When a potentially violent situation occurs, this training may be crucial in de-escalating emotions.

- Ensure that your employees know what employee assistance program services are available to them.

3.8 Create a crisis-response plan:

Prepare your policies and plans for reporting incidents of violence, responding to reported incidents of violence, and reviewing actions to evaluate effectiveness.

3.9 Create an internal emergency communication plan:

Employees should have a means of alerting other workers of a dangerous situation and be able to provide information requested by emergency responders. If appropriate, establish an internal emergency phone number or code word similar to 911 or 999. Place lists of contacts, crisis management plans, evacuation plans, and building plans where they are available to emergency responders. Keep important phone numbers in several places (including off-site locations), available to all appropriate managers and employees. Encourage victims of threats and violence outside the workplace to notify their employers about such incidents. Employers should provide information (and a description or picture of the alleged threatened) to receptionists and other front-line personnel on a need-to-know basis and tell them what actions they should take if that individual seeks entry to the workplace or seeks contact with the employee involved. For environments with greater security risks, consider having more than one employee on the premises at all times.

3.10 Create incident-report, response, and follow-up procedures:

Ensure that all employees know how and where to report violent acts or threats of violence. If your policy requires employees to report all threats or incidents of violence, you must be ready to deal with such a situation. The following should be included in a *threat-incident report*, which will be used to assess the safety of the workplace and to decide on a plan of action:

- Name of the person who made the threat and that person's relationship to the company and to the threatened party
- Names of victims or potential victims.
- When and where the incident occurred and how it ended.

- What happened immediately prior to the incident and what may have contributed to the incident.
- The specific language of the threat.
- Behavior that indicates an intention to carry out the threat.
- A description of the threat-maker and his or her emotional state.
- Names of others directly involved and actions they took.
- Names of witnesses
- What happened to involved parties after the incident.
- Names of supervisory staff involved and their response.
- Steps that have been taken to prevent the threat from being carried out.
- Suggestions for preventing such incidents.

As part of your crisis-response plan, have methods to route reports from outside your organization concerning potentially violent people likely to be at your workplace to the correct person and investigate the reports.

When an incident occurs, bring together all the necessary resources, which may include help from outside the company.

- When a threat is made, consult the sources available to you to help evaluate the level of risk posed by the threat-maker.
- When appropriate, obtain fitness-for-duty evaluations of employees exhibiting seriously dysfunctional behaviors at the workplace.
- When a threat has been made or an incident has occurred, evaluate the situation and, if warranted, notify the potential victims and/or police.
- The employer must respect privacy and confidentiality rights of employees during investigations.

Review risks and determine whether additional security measures should be taken after a threat or violent incident.

- If warranted, provide increased worksite protection when threats of violence have been made, such as additional police or security patrols.
- Alert those who might be affected if the threat-maker carries out his or her threat.
- Consider providing increased protection to threatened employees, such as new phone numbers, relocation, loan of a cellular phone, or a quick-response distress button.
- Counsel potential victims about options available to them, such as obtaining a restraining order.

In terms of follow up of a threat or an incident of workplace violence, keeping the lines of communication open is one of the best things you can do to alleviate anxiety and reduce misinformation. If you react quickly and candidly, informing your workforce about what is going on, you can intercept rumors, calm fears, and reassure employees. Determine how affected workers and managers will be kept informed and follow through with up-to-date information.

Assign a person to be responsible for dealing with the media, if necessary. If an incident of violence has occurred, helping employees with the psychological consequences is the right thing to do; furthermore, it may reduce financial losses caused by absence, lost productivity, and workers' compensation claims. After a violent incident, offer counseling services and follow-up treatment, as needed, to employees and their families.

To prevent further incidents from occurring and to show support for victims, employers should support prosecution of offenders. Accommodate employees after a violent incident in order for them to make court appearances and work with the prosecution. Cooperate with law enforcement authorities to help identify and prosecute offenders through the use of any and all means at your disposal, such as "Crime Stoppers," rewards, etc.

3.11 Establish a threat management team:

A threat-management team can effectively resolve threats or acts of violence. Such a team might include representatives from these areas: security, human resources, legal or medical services or your employee assistance program, and safety. The team may also include external psychologists, psychiatrists, or threat-assessment experts. A threat-management team may be responsible for managing violence prevention programs, including program assessment and training. Other team duties:

- Providing guidance concerning liaison with outside assistance.
- Establishing a plan with local authorities for collecting and preserving evidence.
- Planning for or handling communications regarding incidents (Examples: media relations, internal communications, and rumor control).
- Assigning responsibilities for contacting the families of victims.
- Managing cleanup and repairs.
- Making decisions about returning to work.
- Notifying customers and suppliers about changes in orders.
- Providing employees and their families with information about their benefits.
- Managing operations and trauma care after the crisis.

If you do not have a threat-management team, these duties should be assigned to a designated management representative.

3.12 Test and improve your violence-prevention plan:

One essential element that cannot be overlooked is review of your program at least once a year. Over a year, your organization's personnel, facilities, and issues can change; even if they have not changed appreciably, your committee, threat management team, or employees may have changes or improvements to make to your workplace violence-prevention plan or its policies and procedures. Document each reassessment. The reassessments needn't be arduous and lengthy processes; they should, however, be thorough. View them as opportunities to fine-tune your violence-prevention program and the policies and procedures that make it work. An evaluation should involve the following:

- Reviewing reports and minutes from staff and safety committee meetings.
- Analyzing trends
- Surveying employees
- Identifying new or refresher training that may be needed.
- Requesting periodic law enforcement or consultant review of your plan.
- Making needed changes.

After a violent incident, evaluate the potential for further violence at your workplace and reassess your threat-management plan. Ask the following questions:

- Was our response timely and appropriate?
- Did our employees respond as they were trained to do?
- Would different security measures have reduced the risk?

4.0 DEALING WITH CONFLICT

There is no sure way to tell whether someone will become violent; however, there are often warning signs before violence occurs. These warning signs do not mean that the individual will actually become violent, but in combination, they should be a cause for concern. Warning signs of potentially violent individuals:

- Written, oral, or implied threats or intimidation.
 - Fascination with weaponry or acts of violence.
 - Theft or sabotage of projects or equipment.
 - Alcohol or drug abuse in the workplace.
 - Expressions of hopelessness or heightened anxiety.
 - Intention to hurt self or others.
 - Lack of concern for the safety of others.
 - Externalization of blame.
 - Irrational beliefs and ideas.
 - Romantic obsession.
 - Displays of excessive or unwarranted anger.
 - Feelings of victimization.
 - Inability to take criticism.
 - New or increased sources of stress at home or work.
 - Productivity and/or attendance problems.
-

5.0 DO'S AND DON'T'S FOR DEALING WITH POTENTIALLY VIOLENT INDIVIDUALS

Do's

- Do project calmness. Move and speak slowly, quietly, and confidently.
 - Do listen attentively and encourage the person to talk.
 - Do let the speaker know that you are interested in what he or she is saying.
 - Do maintain a relaxed yet attentive posture.
 - Do acknowledge the person's feelings and indicate that you can see he is upset.
 - Do ask for small, specific favors such as asking the person to move to a quieter area.
 - Do establish ground rules. State the consequences of violent or threatening behavior.
 - Do employ delaying tactics that give the person time to calm down. For example, offer a glass of water.
 - Do be reassuring and point out choices.
 - Do help the person break down big problems into smaller, more manageable problems.
 - Do accept criticism. When a complaint might be true, use statements such as, "You're probably right" or "It was my fault." If the criticism seems unwarranted, ask clarifying questions.
 - Do arrange yourself so that your exit is not blocked.
 - Do make sure there are three to six feet between you and the other person.
-

Don'ts

- Don't make sudden movements that may seem threatening.
 - Don't speak rapidly, raise your volume, or use an accusatory tone.
 - Don't reject all demands.
 - Don't make physical contact, jab your finger at the other person, or use long periods of eye contact.
 - Don't pose in challenging stances: directly opposite someone, hands on hips, or with arms crossed.
 - Don't challenge, threaten, or dare the individual. Never belittle the other person.
 - Don't criticize or act impatient.
 - Don't attempt to bargain with a threatening individual.
 - Don't try to make the situation seem less serious than it is.
 - Don't make false statements or promises you cannot keep.
 - Don't try to impart a lot of technical or complicated information when emotions are high.
 - Don't take sides or agree with distortions.
 - Don't invade the individual's personal space.
-

6.0 SAMPLE ASSAULT/THREAT REPORT

EMPLOYEE

Employer Name	Telephone: Work _____ Home _____
Work Office Address (Street, City, State, Zip)	Employee Classification
Manager's Name:	Telephone

INCIDENT

Name of Assaulter/Threatener	Is she/he an employee? <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of Assault/Threat	Location of Assault/Threat
Assault/Threat was from: <input type="checkbox"/> Personal Confrontation <input type="checkbox"/> Telephone Conversation <input type="checkbox"/> Other, Please Explain:	
Were there witnesses? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, how many? _____ Provide information below and attach their statements. (Determine if witnesses prefer to remain anonymous due to the concern of retaliation by the aggressor.)	

WITNESSES (If additional Witnesses, provide information on attached sheet of paper.)

Witness 1-Name	Telephone Work: _____Home:_____
	Witness Role (i.e. employee, customer etc.)
Witness 2-Name	Telephone: Work_____Home_____
Address	Witness Role (i.e. employee, customer, etc.)

IF ASSAULTED, answer next 6 questions. **If threatened**, go to reverse side of this report.

1. What started the assault?
2. What did the assaulter say when you were assaulted?
3. What was used to hit/strike/injure you?
4. What injuries did you sustain? Was medical treatment necessary?
5. How did the assault end?
6. How did you leave the assault site?

IF THREATENED, answer next 3 questions.

1	As Closely as possible, what were the exact words used?
2.	Was Threatner in a position to carry out the threat immediately?
3	How serious do you believe the threat was and why?

EMPLOYEE RELATED ACTIONS (Employee must complete next two questions whether a threat or assault)

1.	What actions were taken by the employee? (e.g filed workers compensation, obtained medical treatment, used sick leave/vacation, etc.
2.	What specific actions from Employer does employee request related to assault/threat? If none, so indicate.

LAW ENFORCEMENT INFORMATION (Manager, Employee, etc. Attach copy of police report when possible.)

Law Enforcement Agency Contacted - Name of Person/ Officer Helping	Date Contacted	Telephone Number ()
Was a written report completed? <input type="checkbox"/> Yes <input type="checkbox"/> No action What was promised?		

MANAGER ACTIONS



Directions given to Employee (i.e. go home, go to hospital, etc.)
Manager Recommendation <input type="checkbox"/> Prosecution <input type="checkbox"/> Restraining Order <input type="checkbox"/> Letter to Threatener <input type="checkbox"/> Other, please specify.

LEGAL COUNSEL ACTION(S)

Actions Taken:		
Received:	Employee Notified of Chosen Action: <input type="checkbox"/> Yes <input type="checkbox"/> No	Health, Safety Officer Notified: <input type="checkbox"/> Yes <input type="checkbox"/> No
Division Management Notification	EAP Officer Notified: <input type="checkbox"/> Yes <input type="checkbox"/> No	Was Employee and Management notified of other options that can be pursued personally? <input type="checkbox"/> Yes <input type="checkbox"/> No

NOTIFICATON DATES



7.0 _WORKPLACE VIOLENCE PREVENTION POLICY

Symbion

Date: December 2009

a) Mission

Employees are our most valued asset. The strategic goal of Symbion is to improve the quality of our employees' working environment. In that regard safety and security are of the utmost importance. To the extent reasonably possible, Symbion will provide a work environment where employees will not be subjected to acts of physical assault or threats of bodily harm while performing their official duties, wherever those duties are performed. **There shall be zero tolerance of such threats or acts of violence.**

b) Policy on Violence

Symbion views aggressive and/or violent behavior as disruptive and contrary to the development and maintenance of a safe, productive and supportive work environment. Such behavior is actively discouraged. Employees who exhibit such behavior will be held accountable under the policy and work rules, as well as local, state, and federal law.

All threats and acts of aggression or violent behavior should be taken seriously and addressed immediately. Such threats or acts include, but are not limited to:

- Harming or threatening to harm any employee or guest
- Damaging or threatening to damage property or the property of any employee or guest
- Possessing a dangerous weapon or incendiary device on property without prior authorization (Law enforcement officers and (employees who carry weapons in the performance of their duties are considered authorized.)
- Engaging in stalking behavior of any employee

c) Accountability

All personnel are responsible for notifying their immediate managers, or, in the absence of their manager, another member of the management team, of any threats that they have witnessed, received, or have been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which they regard as threatening or violent, when that behavior is job related or might be carried out on a state controlled site, or is connected to state employment. Employees are responsible for making this report regardless of the relationship between the aggressor and the individual to whom the threat or threatening behavior was directed.

d) Directive

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts against employees, visitors, guests, or other individuals while on Symbion property shall be removed from the premises as quickly as safety permits, and shall remain off the premises pending the outcome of an investigation.

Employees are not to remove individuals from the premises. Assistance must be requested from the Capitol Police or local authorities. Symbion will initiate an appropriate response which may include, but is not limited to, suspension and/or termination of any business relationship, reassignment of job duties, suspension or termination of employment and/or criminal prosecution of the person or persons involved.

Employees and managers should work together to identify and report situations or locations where there is a potential for physical assault or threat of bodily harm. Managers may keep files on persons and locations where past specific behavior indicates the existence of anger and hostility; where a significant enforcement action is being taken; or where other behaviors, experiences, attitudes, etc., indicate a potential problem.

Employees should record specific incidents, behaviors or conversations that may indicate a potential for violence. Documentation should be forwarded to their manager. In instances where their manager is the source of potential violence, documentation should be forwarded to the next level of management with a copy to the Safety Officer.

Managers must carefully review and assess information provided by employees or other sources. Appropriate precautions should be taken based on the specific situation. For example: If a problem situation or location is identified, it should be communicated to other employees who are likely to become involved in the situation or come in contact with the location.

Individuals who apply for or obtain a protective or restraining order which lists those specific locations that areas being protected areas must provide to their manager and the Safety Officer with a copy of the petition and declaration used to seek the order, a copy of any temporary protective restraining order which subsequently is granted, and a copy of any protective or restraining order that is made permanent.

The Safety Officer will monitor and evaluate the violence reports in the department on an ongoing basis and will submit annual program reports to the Secretary.