

Portland VA Medical Center
Workplace Violence Prevention Program

1. PURPOSE: To prevent and to manage incidents of workplace, disruption, harassment, bullying, intimidation, threats and stalking and/or physical violence committed by employees, volunteers, or trainees. This policy also addresses the importance of preventing and managing potential disruption of the workplace created by domestic threats in the lives of employees, volunteers, or trainees.

2. POLICY:

a. Workplace violence, and threats of violence, by employees, volunteers, and/or trainees, will be taken seriously and dealt with appropriately. Violations of this policy may result in disciplinary action up to, and including, removal from employment. These acts may also result in criminal prosecution.

b. Each employee who receives a restraining, anti-stalking, or other protective order that lists VA property as a protected area is required to provide the VA Police with a copy of such order. Employee with a restraining, anti-stalking, or other protective order will immediately advise VA Police when that order has been removed.

3. RESPONSIBILITIES:

a. The **Director** is responsible for:

- (1) The safety of all persons in the medical center;
- (2) Authorizing the assessment of potential threats as appropriate; and
- (3) Approval and distribution of final reports from the **Threat Advisory Team (TAT)** for appropriate action.

b. Every **employee, volunteer, and trainee** is responsible for:

- (1) Avoiding any behavior defined as workplace violence.
- (2) Reporting harassment, bullying, intimidation, threats, stalking, violence or any other behavior or event that would create fear of violence in a reasonable person. Reports, including any current anti-stalking or no-contact court orders, must be made to the area supervisor and to VA Police or to the Safety Officer.
- (3) Cooperating fully with investigations by VA Police into threats or potential threats as well as with authorized inquiries by members of the TAT.

c. **Supervisors** play a key role in preventing incidents of workplace violence and a key role in managing incidents when they occur. Once an allegation of workplace violence has been made, and the TAT contacts the supervisor of the alleged offender or other supervisors, supervisors are to give top priority to cooperating with the TAT. TAT requests for incident reports, reports-of-contact, employee records, or other documentation or testimony must be forwarded within 24 working hours of the request.

When the TAT is engaged in ongoing monitoring or risk assessment with an employee, Supervisors, when asked to do so, will notify the TAT case manager of any significant change in the

employee's behavior, disciplinary actions against the employee, or new allegations of misconduct or workplace violence.

Supervisor participation in workplace violence training is a mandatory annual training requirement.

d. **VA Police Officers** are responsible for:

- (1) Assuring immediate security when a threat has been detected;
- (2) Law enforcement investigations;
- (3) Coordinating all other law enforcement functions; and
- (4) Providing the Safety Office with copies of all reports of contact (ROC), witness statements, and any other material pertinent to an allegation of workplace threat or violence.

e. The **Safety Officer**, or his designee, is responsible for

- (1) Collecting all incident reports, ROC's, and other documentation related to workplace violence allegations and keeping those documents in a secure location pending the final report of the TAT;
- (2) Making an initial determination of the urgency and threat of a particular allegation in consultation with other members of the TAT;
- (3) Scheduling a meeting of the TAT if the need is apparent;
- (4) Ensuring that a final TAT report is provided to the Director; and
- (5) Maintaining in a secure location for all material such as ROCs, witness statements, and TAT findings that relate to each workplace violence allegation.

f. **Human Resources** is responsible for maintaining records of TAT cases in a secure location. HR will establish an electronic TAT case data base searchable by date, location or work unit where incident occurred, name of the subject(s) of the investigation, and name of the victims. When the TAT is engaged in ongoing monitoring or risk assessment with an employee, HR will notify the TAT case manager of any significant change in the employee's employment status.

g. The **Threat Advisory Team (TAT)** is responsible for:

- (1) Conducting an assessment of both short- and long-term threats when warranted;
- (2) Developing recommendations for supervisors and others for reducing the risk of violence;
- (3) Striving to protect the dignity of employees who are either the victims of threats or violence or who are accused of workplace violence; and
- (4) Referring supervisors to resources available to employees who may have been traumatized in workplace violence incidents.

h. The **Safety and Risk Management Committee (SRMC)** is responsible for providing program oversight for the prevention and management of violence involving employees, volunteers, trainees, and/or their significant others.

i. The **Disruptive Behavior Board (DBB) (DBC)** is responsible for the management of patient violence programs.

j. **Education Service** is responsible for

- (1) Facilitating training of employees and supervisors related to the prevention and management of workplace violence (i.e., New Employee Orientation and MARS)..
- (2) Members of the TAT will receive specialized threat assessment training as appropriate for their roles.

4. PROCEDURES:

a. Definitions:

(1) **Workplace violence:** behavior, verbalizations, and electronic or written communications that may, by inspiring fear of violence, impair the ability of employees, volunteers, or trainees to perform their duties. Behaviors/communications that would create fear of violence in a reasonable person may include, but are not limited to physical or verbal actions that could be described as:

- (a) Harassment;
- (b) Threats;
- (c) Bullying;
- (d) Stalking;
- (f) Intimidation; and
- (g) Violence

In the event of actual or imminent violence, a ‘Code 5’ (*21) should be called (Refer to MCM No. 00-14, Behavioral Emergencies).

(2) **Threat assessment and management:** an interdisciplinary process that seeks to measure the risk of violence by incorporating knowledge of the scientific literature on the prediction of violence with law enforcement tools, human resources, bargaining unit expertise, and legal consultation. Assessment and management of possible violence risk in an employee will respect all pertinent employee labor and civil rights.

b. The TAT will:

(1) Make every effort to convene within 48 business hours of the Safety Officer’s determination that such a meeting is warranted. Appropriate risk assessment measures may include, but are not limited to, review of available witness statements, HR records, and incident reports; interviews with the threatening subject, the victims, supervisors, and witnesses; application of relevant empirically grounded threat assessment devices; and follow-up on cases, especially after any disciplinary actions have been taken by the supervisors.

(2) The designated TAT leader will provide a final report of supervisory and other recommendations for the Safety Officer, who will forward the report to the Director.

(3) The TAT does not make recommendations regarding employee disciplinary action, but should be consulted about possible violence risk implications of taking disciplinary actions.

(4) The TAT membership may include representatives from:

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- (a) The Director's office;
- (b) Human Resources Management Service;
- (c) Safety;
- (d) Mental Health;
- (e) VA Police;
- (f) Regional Counsel (ad hoc); &
- (g) AFGE

(5) Members of the TAT will receive specialized threat assessment training as appropriate for their roles.

5. REFERENCES:

MCM No.00-14, Behavioral Emergencies

IL 10-97-006 (Under Secretary For Health's Information Letter): *Violent Behavior Prevention Program*, dated February 3, 1997._

6. CONCURRENCES:

Chief, Human Resources Management (P4HRM)

Chief, Education Division (P2EDUC)

Director, Mental Health Clinics (P3MHDC)

Safety Officer (P4FMS)

Bargained 5-10-07 with AFGE 2157 & 2583

7. RECISSION: MCM 00-19 dated August 4, 2006

8. FOLLOW-UP RESPONSIBILITY: The Safety Officer

9. REVIEW DATE:

JAMES TUCHSCHMIDT, MD, MM
Director

Distribution: A