

## Workplace Violence Prevention Policy

### Purpose

This policy:

- communicates The University of Texas MD Anderson Cancer Center's (MD Anderson's) commitment to a violence-free workplace;
- designates the leader responsible for the Workplace Violence prevention program;
- outlines the procedures for reporting incidents; and
- describes the role of our behavioral intervention team, 2-STOP (713-792-7867).

### Policy Statement

It is the policy of MD Anderson to promote a safe environment that is free from Workplace Violence and Threats of Workplace Violence. It is also the policy of MD Anderson to uphold the core value of Safety by providing a high-quality, physically and psychologically safe environment to our patients, employees, and community. This policy prohibits Threatening and/or violent behavior that directly or indirectly impacts our campus community.

Any individual who fails to comply with this policy, including knowingly making a false report or false accusation; failing to comply with a mandatory safety plan; or retaliating against an individual for their role in the reporting, prevention, intervention, or mitigation of prohibited behavior, may be subject to applicable corrective action up to and including termination.

### Scope

Compliance with this policy is the responsibility of all employees, faculty, trainees/students, contingent workers, patients, visitors, and other members of the MD Anderson community.

### Target Audience

The target audience for this policy includes but is not limited to all employees, faculty, trainees/students, contingent workers, patients, visitors, and other members the MD Anderson community.

### Definitions

**Behavioral Intervention (2-STOP) Team:** A multi-disciplinary team of MD Anderson professionals authorized to investigate, make determinations, and take action to assist in resolving incidents of Workplace Violence and Threats of Workplace Violence.

**Behaviors of Concern:** Behaviors that cause concern for the safety and well-being of an individual, group, or institution.

**Governing Body:** Per MD Anderson's [Medical Staff Bylaws](#), the President of MD Anderson as appointed by the Board of Regents.

**Policy Violation:** A confirmed incident of Workplace Violence or Threat of Workplace Violence.

**Threat:** A perceived possibility of harm to a person, the institution, or property. Threats may take many forms including, but not limited to, oral, electronic, or written communications; potential or actual physical contact; and disruptive and/or menacing acts. Threats typically fall into four categories:

- **Direct:** Threats against a specific target, sometimes describing methods for committing Workplace Violence.
- **Indirect:** Threats that are vague, unclear, or ambiguous where the plan, intended victim, motivation, and/or other aspects of the danger are masked or equivocal.
- **Conditional:** Threats that are contingent upon a certain set of circumstances.
- **Veiled:** Threats that are strongly implied but do not specifically Threaten Workplace Violence.

**Weapon:** An object specifically designed, made, or adapted for the purpose of inflicting bodily harm on a person or to cause physical damage (e.g., firearms, knives, clubs, electrical Weapons), excluding concealed handguns in compliance with the [Policy on Concealed Handgun Carriage on MD Anderson's Campus \(MD Anderson Institutional Policy #ADM1254\)](#), small pocket knives, and small chemical dispensers sold commercially for personal protection.

**Workplace Violence:** 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.

## Procedure

### 1.0 Prevention

- 1.1 Employee orientation to this policy and other related procedures.

Workforce members will receive Workplace Violence prevention training designed to help employees recognize and report Behaviors of Concern, Threats, and/or other Workplace Violence incidents. The training will include reporting mechanisms, de-escalation techniques, mitigation strategies, and institutional resources designed to prevent Workplace Violence.

- 1.2 The University of Texas Police at Houston (UT Police) provides timely information about campus crime, safety recommendations, and Workplace Violence prevention efforts including, but not limited to, an annual Security Report (available on the [UT Police website](#)) documenting crime data and mitigation efforts. MD Anderson also has an emergency text message notification system for use during an event where there is an imminent Threat, crisis, or harm.
- 1.3 The [Employee Assistance Program \(EAP\)](#) provides supportive resources to individuals and/or work teams who have been involved in a Workplace Violence incident.
- 1.4 UT Police provides community outreach resources to patients, visitors, contingent workers, and staff in support of the Workplace Violence prevention program.
- 1.5 UT Police will coordinate an annual worksite analysis related to MD Anderson's Workplace Violence prevention program.

- 1.6 The possession of a Weapon on any MD Anderson owned or leased property is prohibited.

## 2.0 Responsibilities

- 2.1 UT Police is responsible for the overall stewardship of MD Anderson's Workplace Violence prevention program.
- 2.2 The Vice President, Chief of Police and Chief Security Officer is the designated leader responsible for the institutional Workplace Violence prevention program. This responsibility includes but is not limited to:
  - A. monitoring compliance with Workplace Violence prevention policies and procedures;
  - B. ensuring completion of reporting and assessments; and
  - C. overseeing Threat management and intervention actions.
- 2.3 The Vice President, Chief of Police and Chief Security Officer will convene a senior executive council to inform and sponsor our Workplace Violence prevention program and initiatives.
- 2.4 The Senior Vice President of People, Culture, and Infrastructure is the executive sponsor of the Behavioral Intervention (2-STOP) Team. This role includes reporting Workplace Violence incidents or concerns to the Governing Body as necessary.
- 2.5 Managers and supervisors have first-line responsibility and accountability for promoting a work environment free from Workplace Violence or Threats of Workplace Violence. Managers and supervisors will review and refer Behaviors of Concern that staff believe may lead to Workplace Violence to the Behavioral Intervention (2-STOP) Team and/or UT Police. The following is a non-exhaustive list of examples of behaviors and situations of concern:
  - A. Unusual or abrupt changes in behaviors or patterns
  - B. Extreme reactions to a loss or a traumatic event
  - C. Preoccupation with Weapons, violent events, or persons who have engaged in violent acts
  - D. Uncharacteristically poor performance
  - E. References to harming others or planning a violent or destructive event
  - F. Evidence of depression, hopelessness, or suicidal thoughts/plans
  - G. Inappropriate responses such as prolonged irritability, angry outbursts, or intense reactions
  - H. Strained interpersonal relations, isolating behaviors, or low self-esteem
  - I. A significant change in life circumstances such as loss of a job or relationship
  - J. Delusional expressions characterized by or holding idiosyncratic beliefs or impressions that are contradicted by reality or rational argument, potentially associated as symptom of a mental health crisis

Policy Violation may lead to corrective action up to and including termination. See the [Corrective Action Policy \(MD Anderson Institutional Policy #ADM0256\)](#), the [Professional Standards and Safety Policy \(MD Anderson Institutional Policy #ADM0261\)](#), and the [Fitness for Duty Policy \(MD Anderson Institutional Policy #ADM0274\)](#).

- 2.6 Workforce members have the responsibility to conduct themselves in accordance with this and other applicable policies. Workforce members observing or gaining direct knowledge of Behaviors of Concern, Threats, and/or other Workplace Violence incidents will notify their supervisor, manager, and/or the Behavioral Intervention (2-STOP) Team. Workforce members will complete all assigned workplace safety training, adhere to reporting requirements, and cooperate with mandatory safety plans.
- 2.7 The Behavioral Intervention (2-STOP) Team will assess and make determinations regarding Policy Violation(s) and any appropriate recommendations to management. The team will work collaboratively with internal and external partners to develop, implement, and evaluate intervention strategies designed to reduce, mitigate, and/or eliminate Workplace Violence.

### **3.0 Reporting Mechanisms**

- 3.1 To report an incident or concern, call 2-STOP (713-792-7867) or UT Police (713-792-2890). The caller should provide the following information as applicable and available:
  - A. A description of the perceived violent behavior
  - B. Name(s) of individual(s) involved in the incident
  - C. Name(s) of any witnesses
  - D. Location where the incident occurred
- 3.2 Anyone may report Behaviors of Concern, an incident of actual or perceived Workplace Violence, and/or Threats. Calls may be placed anonymously.
- 3.3 Emergencies with the potential of imminent bodily harm require immediate action. Individuals should find a safe location and call 911 as soon as it is possible to do so safely. UT Police (713-792-2890) should also be contacted as soon as practical.
- 3.4 Confidentiality: Persons accepting calls and investigating allegations are responsible for maintaining appropriate, applicable confidentiality.

### **4.0 Investigation**

The UT Police Threat Management Team (TMT) serves as the triage, stabilization, and investigative resource for all reported Workplace Violence incidents. The TMT also serves as the investigative arm for the Behavioral Intervention (2-STOP) Team and collaboratively reviews all reports of Workplace Violence. All the Behavioral Intervention (2-STOP) Team members who have facts, action items, and/or other information will contribute to the assessment and mitigation efforts associated with the reported conduct.

### **5.0 Determination and Penalties**

The Behavioral Intervention (2-STOP) Team recommends appropriate action based upon facts and information gathered by the TMT and behavioral intervention team members. Any individual who knowingly makes false accusations, fails to report violations of this policy, or fails to cooperate with a mandatory safety plan has committed a Policy Violation, and may be subject to applicable corrective action up to and including termination.

## **6.0 Action**

Management should take appropriate action based the recommendations of the Behavioral Intervention (2-STOP) Team and other relevant information. If management disagrees with the noted recommendations, management is responsible for submitting a written response to the Behavioral Intervention (2-STOP) Team explaining the rationale for rejecting the recommendations and explaining what, if any, alternate course of action will be taken to address the concerns.

## **7.0 Recordkeeping**

The Behavioral Intervention (2-STOP) Team is responsible for maintaining any appropriate records related to reported incidents of Workplace Violence.

## **8.0 Non-Retaliation**

Retaliation against an individual for their role in the reporting, prevention, intervention, mitigation, or participation in an investigation, hearing, or proceeding testimony is prohibited. Workforce members found to have retaliated against another person in violation of this policy may be subject to applicable corrective action up to and including termination. See the [Non-Retaliation Policy \(MD Anderson Institutional Policy #ADM0254\)](#).

## Attachments/Links

[Employee Assistance Program \(EAP\)](#)

[University of Texas Police at Houston \(UT Police\)](#)

## Related Policies

[Corrective Action Policy \(MD Anderson Institutional Policy #ADM0256\)](#)

[Fitness for Duty Policy \(MD Anderson Institutional Policy #ADM0274\)](#)

[Non-Retaliation Policy \(MD Anderson Institutional Policy #ADM0254\)](#)

[Professional Standards and Safety Policy \(MD Anderson Institutional Policy #ADM0261\)](#)

## Joint Commission Standards / National Patient Safety Goals

EC.01.01.01:

“The hospital plans activities to minimize risks in the environment of care.” *Comprehensive Accreditation Manual for Hospitals (CAMH), 2023.*

EC.02.01.01:

“The hospital manages safety and security risks.” *Comprehensive Accreditation Manual for Hospitals (CAMH), 2023.*

EC.04.01.01:

“The hospital collects information to monitor conditions in the environment.” *Comprehensive Accreditation Manual for Hospitals (CAMH), 2023.*

HR.01.05.03:

“Staff participate in ongoing Workplace Violence prevention education and training.” *Comprehensive Accreditation Manual for Hospitals (CAMH), 2023.*

LD.03.01.01:

“Leaders create and maintain a culture of safety and quality throughout the hospital.” *Comprehensive Accreditation Manual for Hospitals (CAMH), 2023.*

## Other Related Accreditation / Regulatory Standards

Centers for Medicare & Medicaid Services, Department of Health and Human Services - Condition of Participation: Environment of Care, 42 CFR § 482.43, Tag A-0144, 2023.

Centers for Medicare & Medicaid Services, Department of Health and Human Services - Condition of Participation: Human Resources, 42 CFR § 482.42, Tags A-0747, A-0940, 2023.

Centers for Medicare & Medicaid Services, Department of Health and Human Services - Condition of Participation: Leadership, 42 CFR § 482.12, Tag A-0043, 2023.

## References

Randazzo, Marisa R and Plummer, Ellen. Implementing Behavioral Threat Assessment on Campus. A Virginia Tech Demonstration Project. Virginia Polytechnic Institute and State University, 2009.