

Shadowfax

Title	Workplace Violence and Active Shooter Policy
Policy Number	ORG.1014.000.000
Policy Owner	Policy Committee
Approved By	Compliance Committee 7-14-21
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Next Review Date	July 2022
Associated Policies	ORG.1015.000.000 Reporting Concerns and No Retaliation
Associated Procedures	
Associated Forms	

I. POLICY STATEMENT

Shadowfax is committed a safe environment in our facilities for staff members, individuals, volunteers, and third parties acting on behalf of Shadowfax or delivering services to Shadowfax, i.e., consultants, suppliers, etc.

II. PURPOSE

This policy is intended to provide the standards on acceptable workplace behaviors, what to do in the event of known or suspected workplace violence, and to provide standards on training and response to those in a Shadowfax facility at the time of an active shooter situation.

III. SCOPE

This policy applies to all Shadowfax locations.

IV. GENERAL

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This policy is based on the Shadowfax's organizational standards, and, for active shooter situations, is based on the U.S. Department of Homeland Security guidance for how to respond to an active shooter situation.

V. POLICY

Workplace Violence

All staff members, individuals, and other parties in Shadowfax facilities should always be treated with courtesy and respect.

Staff members are expected to refrain from fighting, "horseplay" or other conduct that may be dangerous to others. Conduct that threatens, intimidates or coerces another staff member, individual, volunteer, business associate or other third party in a Shadowfax facility will not be tolerated. Shadowfax resources may not be used to threaten, stalk or harass anyone at or outside the workplace. Shadowfax treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to the Human Resources (HR) department or a member of the Shadowfax management team. When reporting a threat or incident of violence, the reporter should be as specific and detailed as possible.

Staff members should not place themselves in peril, nor should they attempt to intercede during an incident.

Staff members should promptly inform the HR department of any protective or restraining orders they have obtained that lists the workplace as a protected area. Staff members are encouraged to report safety concerns with regard to intimate partner violence. Shadowfax will not retaliate against staff members making good-faith reports. Shadowfax is committed to supporting victims of intimate partner violence by providing time off for reasons related to intimate partner violence.

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Active Shooter

The definition of an active shooter is a person actively engaged in killing or attempting to kill people in a confined and populated area. In most cases, active shooters use firearms and there is no pattern or method to their selection of victims. Realistically the event, which usually lasts under 15 minutes, will be over by the time law enforcement arrives. Responses in an active shooter situation have the goal of maximizing survivability, meaning you must act to evaluate the situation and determine if you are going to safely evacuate, hide and barricade, or fight, aka “RUN-HIDE-FIGHT”.

Every Shadowfax location will maintain and disseminate active shooter procedures to:

- A. Staff Members
- B. Volunteers
- C. Third parties acting on behalf of Shadowfax or delivering services to Shadowfax who maintain a regular presence in our facilities
- D. Individuals receiving services from Shadowfax, or their responsible parties, as appropriate

The active shooter procedure will describe actions to be taken in the event of an active shooter situation in that Shadowfax facility, including at a minimum:

- A. How to respond to an active shooter situation using the RUN-HIDE-FIGHT model of first attempting to safely evacuate, if that cannot be done hide and barricade in place, or, as a last alternative, fight.
- B. Who to contact in the event of an active shooter situation.
- C. Post-situation actions such as notifying individuals families, handling media inquiries, cooperating with authorities, etc.

Staff members and volunteers shall be given active shooter response training as part of their orientation to Shadowfax and annually thereafter.

Each department providing services to individuals will include procedures for active shooter training and drills as part of their Emergency Disaster training and drills, see policy ORG.1005.000.00 Emergency Disaster Evacuation.

Page 3 of 5 ORG.1014.000.000 Workplace Violence and Active Shooter Policy
Note to reader: “Individual” is synonymous with resident, client, patient, consumer, or participant

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Only designated and approved Shadowfax spokespeople may speak on behalf of Shadowfax, and all media inquiries should be directed to those spokespeople.

Investigations and Enforcement

Shadowfax will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. Shadowfax will not retaliate against staff members making good-faith reports of violence, threats or suspicious individuals or activities, see policy ORG.1015.000.000, Reporting Concerns and No Retaliation. To maintain workplace safety and the integrity of its investigation, Shadowfax may suspend staff members suspected of workplace violence or threats of violence, either with or without pay, pending investigation.

Allegations of threats of violence or incidents of actual violence that meet the standards outlined in Shadowfax's Incident Management policy will follow the policy's guidelines for reporting, response, and corrective action (see ORG.1007.000.000 Incident Management Policy).

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Shadowfax encourages staff members to bring their disputes to the attention of their supervisors or the HR department before the situation escalates. Shadowfax will not discipline staff members for raising such concerns.

VI. OVERSIGHT

Shadowfax's Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

1. Identifying the activities necessary to comply with this policy based on regulatory and program requirements.

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2. Assigning, as appropriate, designees to implement the policy and associated procedures.
3. Periodically reviewing this policy and monitoring compliance to it.
4. Training responsible parties on their obligations under the policy.

Revision History

Name	Date	Reason for Changes	Version