

DEPARTMENT: Information Protection and Security	POLICY DESCRIPTION: Theft and Violence in the Workplace
PAGE: 1 of 4	REPLACES POLICY DATED: 5/1/10, 11/1/12, 8/1/16, 9/1/18
EFFECTIVE DATE: February 1, 2019	REFERENCE NUMBER: IP.PS.002 (formerly IP.PS.006 and SS.001)
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: Employees of HCA-affiliated subsidiaries including, but not limited to hospitals, ambulatory surgery centers, outpatient imaging centers, physician practices, HealthTrust Workforce Solutions, service centers, Corporate Departments, Groups, and Divisions (collectively, “Affiliated Employers” and individually, “Affiliated Employer”).</p>
<p>PURPOSE: To provide guidelines in an effort to establish a work environment as free from the threat of violence and theft as is reasonably possible for employees, physicians, patients, volunteers, contractors, visitors and customers who should be treated with courtesy and respect at all times.</p>
<p>POLICY:</p> <ol style="list-style-type: none"> 1. Facilities must implement the Company’s Model Safety and Security Program. 2. Employees must report to their supervisors, security staff or human resources representative any suspicious workplace activity, situations or incidents relating to security that they observe or that they become aware of whether involving other employees, former employees, physicians, patients, volunteers, contractors, visitors or customers, and all such reports should be presented to the Director of Security. 3. Affiliated Employers will not tolerate threats or acts of violence, aggressive behavior, offensive acts, threatening or offensive comments or remarks. Every specific or implied verbal or physical threat of violence, or act of violence, must be treated seriously. 4. Facility administration may restrict or prohibit weapons in the workplace even if the individual possesses a valid concealed weapons permit issued by the state. A Summary of State Firearms Laws is available on Atlas. The permit possessing individual has the right to lock the firearm inside a private motor vehicle. Under some conditions federal, state, or local law enforcement officers are permitted to carry weapons in certain areas or for specific purposes. 5. Facility Administration has the authority to search any facility property which includes property of any nature owned, controlled or used by the facility, including but not limited to parking lots, offices, desks, file cabinets, and lockers. Facility Administration specifically reserves the right to search personal property which has been brought onto the premises, including but not limited to vehicles, handbags, briefcases, packages, clothing and other personal items. In addition, an employee, physician, patient, volunteer, contractor, visitor, or customer may be requested by Facility Administration to submit to a search of his/her person. Facility Administration may respond as deemed appropriate in the event anyone may refuse a search or may show a lack of cooperation during a search.

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PROCEDURE:

1. **Risk Reduction**

Human Resources will undertake certain efforts in the employment background investigation process to reduce the risk of hiring individuals with a history of theft or violent behavior.

Each facility shall designate and communicate a point of contact in its safety plan. The facility's Safety and Security Committee will ensure appropriate inspections of the premises are conducted in an effort to evaluate and determine vulnerability to workplace violence or hazards and follows up with necessary corrective action. The facility's Safety and Security Committee will ensure an appropriate individual will conduct a review of occurrence reports, workers' compensation claims and security reports, analyze trends and rates of injury caused by violence in the workplace, and track changes in workplace controls as they occur.

2. **Notification**

Safety and security in the workplace is every employee's responsibility. Employees are asked to be alert to unauthorized persons in any area of the facility. Employees are urged to offer assistance in directing or escorting the person to his/her destination. Employees are expected to inform their supervisors, security staff, human resource representative, another member of management or the facility's Ethics and Compliance Officer of behavior exhibited by any person(s) which could be a sign of a potentially dangerous situation. Such behavior might include:

- Discussing weapons or bringing them to the workplace.
- Displaying overt signs of extreme stress or agitation, resentment, hostility or anger.
- Making threatening remarks.
- Sudden or significant deterioration of performance.
- Displaying irrational, intimidating, aggressive or inappropriate behavior.
- Reacting to questions with an antagonistic or overtly negative response.
- Reacting harshly to changes in policy and procedure.
- Personality conflicts with co-workers.
- Obsession or preoccupation with a co-worker or supervisor.
- Attempts to sabotage the work or equipment of a co-worker.
- Blaming others for mistakes and circumstances.

If an employee receives or perceives a threat or if an employee is the victim of violence while on the premises, he or she should immediately report it to a supervisor, security staff or human resource representative. The police or appropriate law enforcement agency may also be contacted.

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3. **Enforcement**

Employees may report violations and raise any questions regarding their responsibilities under this policy in good faith without fear of reprisal.

All threats will be promptly investigated. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

Any employee accused of committing or threatening violence or any employee found to be carrying a weapon on Company property or during Company business will be suspended immediately, pending the outcome of an investigation by the Security Director and Human Resources.

If following an appropriate investigation, it is determined that this policy has been violated, appropriate corrective action, up to and including termination, will be taken.

4. **Post Incident Response**

Affiliated Employers will provide support to an employee who is a victim of violence in the workplace that includes treatment, individual counseling, and paid time to pursue prosecution.

- Treatment is provided through the workers' compensation program or the Texas Employee Health and Safety Program Benefits Plan (EHSP).
- Employees will be paid at base rate for time to pursue prosecution.
- Counseling services are provided through the Employee Assistance Program (EAP).

An employee who is a victim of violence other than a felony defined by the jurisdiction may pursue prosecution at the employee's discretion and will be supported as described above.

Affiliated employers with an employee who is a victim of violence defined by the jurisdiction as a felony will assist the employee in pursuing prosecution as described above. Additionally, the affiliated employer may engage legal counsel when doing so is considered appropriate.

5. **Training**

Affiliated Employers will provide training opportunities intended to make employees aware of workplace violence risk reduction efforts and the support available to an employee who is a victim of violence in the workplace. This training is presented:

- At the time of orientation for new employees.
- Periodically through Code of Conduct training.
- Regularly by supervisors and/or the facility's Safety Committee or manager responsible for safety and security.

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Security staff will receive training on the appropriate use of force in an effort to provide physical protection within the parameters of policy, and their specific job requirements. Skills include situation/response analysis, psychology of deterrence, attack management, security tactics, and a clear definition of responsibility and authority. Training should aid in presenting a respectable and competent presence in routine operations, provide the security personnel with skills for use in unusual and emergency situations, and provide management with a logical and consistent framework for planning, response, control, and after-action analysis and justification.

Clinical staff in security sensitive areas such as the Emergency Department and Critical Care areas should receive crisis prevention/intervention training that teaches staff to respond effectively to the warning signs of escalating aggressive behavior, and addresses how staff can deal with their own stress, anxieties, and emotions when confronted with these challenging situations. Training should focus on preventing disruptive behavior by communicating with individuals respectfully and with concern for their well-being, but should also teach appropriate physical intervention where necessary.

6. Property

All personal belongings should be protected by keeping them out of sight or inaccessible. Affiliated Employers are not responsible for the loss or theft of personal items.

Supplies and equipment should be stored in approved areas and security measures are to be observed.

Supplies, equipment, material, or property belonging to the facility, other employees, patients, volunteers, contractors, visitors or customers may not be removed from the premises by an employee without authorization.

REFERENCES:

[Summary of State Firearms Laws](#) available on Atlas