

# WORKPLACE SAFETY

## **INTRODUCTION:**

NorthStar Community Services is committed to providing a safe and healthy work environment, and to promoting and protecting the health, safety, and well-being of our employees, individuals served, families and visitors. In continuation of this goal, employees are expected to exercise good judgment to avoid work related injuries to themselves, individuals served, families and others, and are encouraged to advise the Compliance Officer of any safety concerns regarding the workplace. An employee who has sustained a work-related injury should immediately seek appropriate emergency medical treatment and notify their supervisor of the injury as soon as possible and no later than 24 hours after the accident. The Executive Director is expected to promote and support a safe work environment and to report unsafe conditions and injuries in accordance with this policy.

The Compliance Officer is responsible for the implementation of the health and safety procedures.

## **POLICY:**

The organization values the health and safety of our employees, individuals served, families and visitors, and maintains an environment that conforms to all legal, regulatory and carve health and safety standard requirements. Prevention of workplace violence begins with careful planning.

NorthStar has adopted this policy to minimize injuries and accidents in the workplace. This policy is also consistent with and furthers our objectives to promote a safe, healthy, and productive work environment.

Behaviors prohibited by this policy may also be prohibited by other policies. Any questions about what constitutes violent behavior should be directed to the Compliance Officer.

## **DEFINITIONS:**

### ***Workplace Violence:***

A threat or act of workplace violence is defined as any direct or indirect action or behavior that threatens the individual or property of employees, individual served or visitors or that could be reasonably interpreted as a threat to cause harm to such individuals or property. This list of behaviors, while not exhaustive, provides examples of conduct prohibited by this policy.

- Physical assault, threat of assault, or stalking of an employee, individual served or visitors;
- The act of possessing a weapon or using a weapon to threaten someone;
- Intentional damage to NorthStar property or the personal property of another individual;
- Aggressive, or hostile behavior that creates a reasonable fear of injury to another individual;
- Harassing or intimidating behavior or statements, telephone calls, voicemails, email messages or other communications; and
- Threatening or abusive racial or cultural epithets, or other derogatory remarks.

The National Institute for Occupational Safety and Health (NIOSH) definition of workplace violence:

- Any physical assault threatening behavior or verbal abuse occurring in a work setting;
- Includes, but is not limited to:
  - Beating, stabbing, suicide shooting, rapes, near suicides
  - Psychological traumas such as threats, obscene phone calls, and intimidating presence and
  - Harassment of any nature, such as being followed, sworn or shouted at.

### ***Weapon:***

For purpose of this policy, the following list, while not exhaustive, identifies the major types of devices that are considered “weapons”:

- Firearm, including a BB or pellet gun, whether loaded or unloaded
- Knife or stiletto including switchblade or other knife with an automatic spring release device but excluding small pen or pocket knives
- Police, baton or nightstick
- Any martial arts weapons or electroshock defense weapons

Employees are responsible for making sure that any item possessed by the employee is not prohibited by this policy.

***Dangerous Instrument:***

A “dangerous instrument” is defined as an instrument, article, or substance that, under the immediate circumstances, is capable of causing physical injury or death. An employee who has a question about whether an instrument, article, or substance is considered a weapon or dangerous instrument prohibited by this policy, should ask for clarification from the Compliance Officer before bringing the instrument, article or substance onto any NorthStar facilities or properties.

***Firearms:***

Employees shall not bring firearms into any NCS facilities or have a firearm in their possession (including any conceal and carry weapons). A conceal and carry weapon must be kept locked within a secondary locked area of the vehicle (i.e., trunk, glove box).

***Emergency:***

For the purpose of this policy, a situation is considered emergency if:

- And injury has occurred or
- There is an immediate threat of physical harm or injury
- A call has been placed to 911 or other local enforcement agencies

***Non-Emergency:***

A situation is considered a non-emergency if:

- No injury has occurred, and
- There is no immediate danger, but the words, gestures or other actions of one individual have induced fear of physical harm in another individual.

**PROCEDURES:**

1. Employees will wear their identification badges on and off site.
2. If an individual presents a danger to self or others, the responding employee will dial 911 immediately. The Executive Director and/or Compliance Officer will make the necessary arrangements to try to protect the individuals, others, or both and link the individual with the appropriate level of care.
3. When possible, employees should set out the early use of individualized de-escalation techniques.
  - De-escalation techniques should be employed prior to other interventions being used unless the individual presents immediate danger to self or others; then law enforcement 911 should be contacted immediately.
  - The incident should be thoroughly documented and reported to the Compliance Officer. As necessary, the Compliance Officer or designee will contact law enforcement.
4. If unacceptable behavior is perpetrated by an individual served, family member and visitor, an official warning should be given.
  - Failure to comply with this warning could lead to removal of the individual from the facility and possibly intervention by the police.

5. If an individual, family member or visitor is violent at an offsite location or site, not managed solely by NorthStar, the aforementioned procedure should be followed first after the Executive Director is contacted, the employee should follow the procedure observed by the specific worksite.

Safety can only be achieved through teamwork at our facility. Each employee must practice awareness by proactively anticipating unsafe situations by being alert and reporting unsafe conditions immediately.

It is important for all employees, individuals served, and visitors to feel comfortable and safe while at the facility. Therefore, the possession of firearms, explosives or other weapons are not allowed on company property, in company vehicles or while working for the company offsite. Any violent behavior, threats of violence or even the suggestion of violence is prohibited. The deliberate destruction of property, the property of others and any valuable property is also prohibited.

### **Reporting Concerns About Workplace Safety**

1. Employees are required to maintain their personal workspace in such a manner that the safety of themselves, individual served, families and others is not adversely affected. Furthermore, employees are required to exercise good judgment in performing work tasks in a manner that prevents injury.
2. Employees are required to report safety concerns regarding the workplace.
  - Complete the Critical Incident Report Form
  - Submit the form to the Compliance Officer
3. The Compliance Officer will address reported concerns in a timely manner, consistent with the level of risk posed.

### **Reporting Work Related Injuries**

Employees who sustained or observed a work-related injury, and those who to whom such an injury is reported, should follow the steps outlined below.

1. The employee should immediately seek an appropriate emergency medical treatment and cooperate with the medical first responders.
2. As soon as practical and as no later than 24 hours after the incident, the employee should contact Human Resources, 218-590-6433 to report the injury and the circumstances surrounding the incident.
3. Complete and submit Critical Incident Report Form.
4. Human Resources will coordinate all internal and external administrative activities
5. Employees who receive additional or supplemental reports related to an injury, including a police report, must forward such reports to Human Resources in a timely manner.

### **Prevention Of Work of Violence & Possession of Weapons In The Workplace**

The organization strives to maintain a productive work environment, free of violence and the threat of violence. We are committed to the safety of our employees, individuals served, families and visitors. The goal is to ensure a safe workplace and to reduce the risk of violence.

The organization prohibits the possession and use of dangerous perilous weapons on NorthStar facility property. A license to carry a weapon does not supersede NorthStar policy. This prohibition includes, but is not limited to, NorthStar building, parking lots, personal vehicles, surrounding areas, such as sidewalks, walkways, driveways and parking lot(s) under NorthStar control. All employees are subject to this provision, including contact, contract and temporary employees, individuals served, families and visitors on NorthStar facility.

## Drug Free Workplace

The organization values its employees and recognizes the need for a balanced approach to achieving a drug free workplace. The drug free workplace policy is intended to comply with all state laws governing drug and alcohol testing and is designed to safeguard employees and individuals served privacy rights to the fullest extent of the law.

1. NorthStar is committed to a drug free workplace.
  - All employees are expected to report to work free of the influence of alcohol and illegal drugs.
    - Anyone reporting to work under the influence of any substance or using, possessing, distributing, or selling illegal drugs while on NorthStar time or property may result in immediate termination.

This means that employees cannot illegally manufacture, distribute, dispense, possess, or use any controlled substance in the workplace. This commitment is jeopardized when any employee, individual served, family or visitors engage in use, possession, sale, conveyance, distribution or manufacture of illegal drugs, intoxicants, controlled substances, or abuses, prescription drugs or alcohol. Substance abuse is a significant public health problem which has a detrimental effect on the business community in terms of productivity, absenteeism, accidents, medical costs, theft and workers compensation costs. As a result, the organization has established the following policy:

1. It is a violation of policy for any employee, individual served, or visitors to use, possess, sell, convey, distribute, or manufacture illegal drugs, intoxicants or controlled substances or to attempt to do the same.
2. It is a violation of NorthStar policy to use or be under the influence of alcohol anytime during the hours of business operations while on or using a facility or doing business off site.
3. It is a violation of policy for anyone to use prescription drugs illegally. It is the responsibility of the employee to report the use of prescribed drugs, that **MAY** (per warning labels provided by the pharmacy) affect the individual served participation in the program or the employees, judgment, performance, or behavior.
4. Violations of this policy are subject to disciplinary action up to and including termination of employment and or discharge of individuals served from the program.

***\*\*\*If you are concerned that you may have a problem with abuse of alcohol and or legal drugs, please contact Human Resources for immediate assistance.***

## Incident Reporting

The below provides information about incident reporting procedures, investigations and disciplinary measures.

The employee should be as specific and detailed as possible, when reporting workplace violence or weapons possession. Employees are encouraged to report any circumstances that might lead to workplace violence, (e.g., confrontations, outside work, protective and restraining orders).

- Complete and submit Critical Incident Report Form to Human Resources
- **Emergency:** In an emergency, the employee should consider their personal safety first, if possible, from a safe location, the employee should follow the steps below:
- Call 911 if appropriate
- Notify the Compliance Officer, Sierra Nelson, at 218-249-1280 or by email at [sierra.nelson@northstarcommunityservices.com](mailto:sierra.nelson@northstarcommunityservices.com)
- **Non-Emergency:** In the event of an emergency, the employee should complete and submit a Critical Incident Report Form to report the emergency situation.

## Investigation

In compliance with the reporting process as outlined above, any employee who witnesses or otherwise becomes aware of acts or threats of violence, possession of weapons, or other conduct prohibited by this policy should immediately notify the Compliance Officer to permit a timely investigation.

1. Complete and submit a Critical Incident Report Form  
Any employee who knowingly allows, tolerates or fails to report acts or threats of violence, weapons possession or other prohibited conduct are in violation of this policy and may be subject to discipline up to and including termination.
2. The Compliance Officer will promptly and thoroughly investigate all reports of workplace violence or weapons possession.
3. In certain circumstances, individuals may be removed from the work environment pending the outcome of the investigation.
4. A designee may be asked to assist in the investigation or to take immediate steps to ensure staff safety.
5. The Compliance Officer will, to the extent possible, protect the confidentiality of any individual that makes reports of workplace violence or weapons possession. And will strive to avoid any unnecessary disclosure of information.
6. All employees are required to be truthful, accurate, discreet and cooperative throughout the investigation.

### **Disciplinary Measures**

The Compliance Officer, in conjunction with Human Resources, will make the recommendation of the appropriate disciplinary action to be taken against any employee who is found to have violated this policy. Depending on the seriousness of the offense, disciplinary action may include documented oral, written reprimand or suspension, termination of employment.

1. The President/CEO and/or Human Resources will execute the disciplinary action. Where appropriate, the Compliance Officer will report threats or acts of violence in possession of drugs and weapons or dangerous instruments to local law enforcement authorities.

## **HEALTH & SAFETY - ORGANIZATIONAL RESPONSIBILITY**

### **POLICY:**

- A. NorthStar values the health and safety of the individuals we serve, employees, and visitors, and maintains a comprehensive safety program to promote a safe environment within our program sites.
  
- B. It is the policy of NorthStar to maintain an environment that conforms to all legal, regulatory, and accreditation health and safety requirements, and to designate individuals responsible for the planning, implementation, and oversight of a comprehensive organization-wide health and safety program. NorthStar health and safety procedures will focus on two major areas: the identification, monitoring, evaluation, reduction, or elimination of health and safety risks; and planning and preparation to maximize the health and well-being of individuals in the event of disasters or emergency situations.

### **PROCEDURES:**

- A. Responsibility for health and safety programming, procedures, and practices are designated as follows:
  - 1) The Compliance Officer along with the President/CEO is charged with the overall responsibility of health and safety management for NorthStar. They may delegate this role to designated staff (s), as needed. Within this role:
    - a. all health and safety policy and procedure receives final approval.
    - b. risk management and critical incident issues that affect the overall stability and continuing operation of the organization are reviewed.
    - c. serves as the organizational health and safety point-of-contact regarding regulatory or third party inquiries.
    - d. and provides broad support for training initiatives and fiscal stability to support ongoing health and safety programming and practices.
  
  - 2) The Compliance Officer or designee(s) are responsible for the overall coordination of the health and safety program at each program site. In carrying out this role, the Compliance Officer or designee(s) will provide as needed and/or monthly reports to the behavioral health team when needed, regarding:
    - a. the health and safety conditions and activities at each program site
    - b. conduct program site emergency drills and inspections, document and report the results of drills and inspections,
    - c. seek to make corrections and improvements based on the drill and inspection outcomes,
    - d. and ensure the health and safety policies and procedures are being carried out within each program site's daily operations.

In addition, the Compliance Officer will be responsible for the maintenance of the program documentation of drills and assessments. The Compliance Officer or designee will report directly to the President/CEO with regard to health and safety requirements and will communicate all information related to health and safety practices, concerns, and/or issues in a manner that ensures that the health and safety of all individuals served, employees, and stakeholders is upheld to the highest degree possible.

- 3) All safety documentation will be maintained at each program site by the Compliance Officer or designee for the purpose of enhancing the structure and organization of each site's safety program. The documentation will be either stored and filed on site or will be uploaded in our document management system and will serve to conveniently locate all health and safety documentation that is associated with required safety activities.

All documentation will be organized in one of the following:

- a. Yearly Safety Activity Requirements Grid
  - b. Section One: Outside/External Inspection:
    - (1) A document that includes all the areas that were inspected by an outside authority, and any recommendations that were made to improve safety
    - (2) A document, or evidence "in writing" that details how and when any recommendations were addressed by the organization that were made by the outside inspection.
  - c. Section Two: Self-Inspections
    - (1) Completed self-inspection checklists. The documents should note all areas inspected, any areas not meeting items on the list, and documentation or evidence "in writing" that documents how and when any areas needing improvement were addressed.
    - (2) Copies of the self-inspection form.
  - d. Section Three: Safety Drill Procedures
    - (1) All safety drill policies and procedures
  - e. Section Four: Safety Drill Reports, Recommendations, Actions
    - (1) Completed Safety Drill Reports for each of the six required drill areas for each year, which include a review of the drill and recommendations for improvements. Drill areas are as follows:
      - a. Fires
      - b. Bomb Threats
      - c. Natural Disasters (winter/tornadoes)
      - d. Utility Failures
      - e. Medical Emergencies
      - f. Violent or other threatening situations
    - (2) Any documentation of improvements made
    - (3) Copies of the safety drill forms
    - (4) Ensure notification of the appropriate emergency authorities
    - (5) Communication with relevant stakeholders.
  - f. Section Five: Incident Reports
    - (1) Paper copies or on-line copies of incident reports that have been completed at the program site.
  - g. Section Six: Safety Documentation
    - (1) Sections of any meeting minutes that note health and safety issues, actions, and/or recommendations are highlighted and placed in this section.
- 4) Ongoing oversight of the organization's health and safety policies and procedures is the responsibility of the President/CEO and Compliance Officer. Within this role, they will ensure that all regulatory requirements are carried out within the day-to-day operations of the organization through monitoring, supporting, and guiding the following activities:

- a. Health and safety policy and procedure development, implementation and monitoring.
- b. Education and training during orientation for individuals served in health and safety practices.
- c. Initial and ongoing education, and training of employees in health and safety issues.
- d. Incident reporting and use of information.
- e. Immunization and infection control.
- f. Facility safety monitoring, correction, and improvement.
- g. Fire and occupancy certification.
- h. Disability access.
- i. Storage areas.
- j. Emergency preparedness drills and documentation.
- k. Emergency response and documentation.

5) All employees are expected to perform their jobs in a safe manner. Employees are primarily responsible for their own health and safety and the safety of individuals in their care. This responsibility includes proper hand washing, storage and use of chemicals, control of bodily fluids/blood borne pathogens, knowledge of fire evacuation procedures, use of protective gear, managing behavior to prevent violence, and reacting to the potential for violence with measured, appropriate interventions. All employees are responsible for immediately correcting conditions or practices that are unsafe or unhealthy. Unsafe or unhealthy practices and/or conditions are to be reported immediately to the appropriate staff, as per policy and procedure. Employees are required to promptly report any accident, injury, or incident (real or suspected), and any conditions or practices, which cannot be corrected by a staff member, should be reported in accordance with the appropriate procedure (safety drill and/or inspection reports, incident reports, corporate compliance reports, direct communication with supervisor). All staff will ensure that the individuals served receive education designed to reduce identified physical risks while attending a program or while on-site, or being transported.

B. All areas of health and safety are detailed within written policies, procedures, handbooks and plans. These areas include the following:

- 1) External Safety Inspections.
- 2) Internal Safety Self-Inspections.
- 3) Emergency/Disaster Plans and Drills.
- 4) Safety Information Dissemination.
- 5) Emergency and First Aid Equipment.
- 6) Critical Incident Reporting.
- 7) Use of tobacco products, alcohol, illegal and legal substances, prescription medications, and weapons.
- 8) Individuals Served Medications.
- 9) Infection Control/Universal Precautions/Biohazards.

C. Personnel receive documented competency-based training:

- 1) Orientation and at least annually thereafter:
  - a. Health and Safety practices
  - b. Identification of unsafe environmental factors
  - c. Emergency Procedures
  - d. Evacuation Procedures

- e. Identification of Critical Incidents
- f. Reporting Critical Incidents
- g. Medication Management if appropriate
- h. Reducing physical risks
- i. Workplace violence

## **FIRE EMERGENCIES**

Fire, on structural buildings, claims lives and causes an extensive amount of property damage. Using common sense in a fire emergency can save most lives. NorthStar urges you to follow these practical steps to protect yourself while working at your program.

### **PURPOSE:**

This NCS wide policy provides information for proper employee response to a fire emergency.

### **POLICY:**

In the unlikely event of a fire emergency, NCS staff shall be prepared to respond in a way which minimizes risk to the building and its occupants.

### **PROCEDURE:**

1. **SOUND THE ALARM** - If you discover or suspect a fire, sound the building alarm by activating the nearest pull station. If the building is not equipped with a fire alarm system, warn the other occupants by knocking on doors and shouting a warning as you leave.
2. **LEAVE THE BUILDING** - Try to help others only if you can do so safely. After exiting the building, remain at least 100 feet away from it. **DO NOT** go back into the building until emergency responders say that it is safe to do so.
3. **CALL PUBLIC SAFETY** - Give as much information as possible to the communications officer.
  - a. 911
  - b. Minnesota State Patrol: 218-302-6127
  - c. Cloquet Police Department: 218-879-1240
  - d. Cloquet Fire Department: 218-499-4258
  - e. Duluth Police Department: 218-730-5400
  - f. Duluth Fire Department: 218-730-4394

# **BOMB THREATS**

## **PURPOSE:**

This NCS wide policy provides information for proper employee response to a bomb threat.

## **POLICY:**

In the unlikely event of a bomb threat, NCS staff shall be prepared to respond in a way which minimizes risk to the building and its occupants.

## **PROCEDURE:**

The Individual in Charge: The highest level of personnel on duty assumes the role of the individual in charge and indicates when to activate the alarm system.

1. If law enforcement, the fire department or other authority arrives on the scene, a Response Team may be established. This team may include emergency personnel, maintenance or facility workers and any individuals that are extremely familiar with all facets of the facility.
2. Complete the Bomb Threats Form
3. Initiate the evacuation process. All staff and individuals served will exit the facility according to the emergency evacuation process and meet at the designated location.
4. Once at the designated location, complete a head count to ensure all staff, individuals served, and visitors are accounted for.
5. DO NOT TURN ON/OFF lights or other electrical equipment (use flashlights if necessary).
6. DO NOT USE two-way radios, cell phones, other cellular/transmitting equipment.
7. DO NOT TOUCH OR MOVE anything unusual or suspicious.
8. LOOK FOR ANYTHING YOU CANNOT IMMEDIATELY IDENTIFY or anything that appears to be unusual or out of place. The device may be labeled “bomb” or “explosive” or “danger.”
9. Remain evacuated until the “All Clear” message has been received

## **UTILITY FAILURES**

### **PURPOSE:**

Emergency procedures for utility failures are developed to ensure provisions are in place in the event of power outages, gas leaks, loss of water access, or communication failure.

### **POLICY:**

In the event of a utility failure, the program staff will contact the appropriate facilities coordinator, facilities manager or utility company and may request additional manpower or equipment.

### **PROCEDURE:**

1. Evacuate the building using evacuation routes, if necessary
2. Stay to the right of hallways and stairs; do not use elevators
3. Assist people with disabilities if needed
4. Go to the building's designated evacuation area and notify emergency staff 911 that you have evacuated safely and report the location of the failure and any additional information that may be helpful

## **MEDICAL EMERGENCIES**

### **POLICY:**

NCS will provide careful, rapid, response to medical emergencies to consumers, visitors, and staff in our programs to minimize the threat to life and limb.

### **PROCEDURES:**

In the event of an accident or injury, attending staff will identify the nature of the emergency and carry out the following:

1. In the absence of a heartbeat, pulse or breathing, ensure the safety of the individual and initiate CPR, and call or ensure 911 is called for an ambulance to transport the individual to the hospital.
2. If there is heavy bleeding, control the bleeding and call or ensure 911 is called for an ambulance to transport the individual to the hospital.
3. When emergency responders arrive, relate the necessary information and any action that employees have taken.

When the individual has been transferred to the care of Emergency Medical personnel, staff should:

1. Contact a family member as soon as possible (if applicable)
2. Contact immediate Supervisor regarding nature of the emergency
3. Debrief the event with the Supervisor

## **NATURAL DISASTER: TORNADO**

### **PURPOSE:**

This NCS wide policy provides information for proper employee response to a natural disaster.

### **POLICY:**

In the unlikely event of a natural disaster, NCS staff shall be prepared to respond in a way which minimizes risk to the building and its occupants.

### **PROCEDURES:**

A tornado watch means conditions are favorable for a tornado to form and a tornado warning means a tornado has been spotted in your area and you should take shelter immediately.

If a tornado is spotted:

1. Seek shelter immediately
2. Seek out a basement or interior corridor
3. Avoid upper floors of buildings and parked vehicles
4. Stay away from all windows
5. If you're out in the open, lie flat in a ditch or other low-lying area and protect your head
6. Stay away from poles or overhead lines
7. If you're driving, drive at right angles to the tornado's path; if you can't escape it, get out of the vehicle and seek a low-lying area
8. If a basement is not available, go into a windowless room in the center of the building
9. Stay away from windows and cover yourself with a rug for protection against flying glass and debris

# **INTRUDERS & ACTIVE SHOOTERS**

## **PURPOSE:**

This NCS wide policy provides information for proper employee response to a potentially active violence situation.

## **POLICY:**

NCS staff shall be prepared to respond in a way which minimizes risk to the building and its occupants.

## **PROCEDURES:**

### **A. If the threat is in the building:**

1. The individual engaged with the threatening individual should initiate the silent alarm phrase by contacting another staff member
2. If the individual engaged with the individual is alone, he or she will attempt to send an inconspicuous email/text message to someone else in the facility, notifying them of the situation.
3. The individual who received the silent alarm phrase should call 911 immediately and notify other staff members of the situation.
4. Once notified of the situation staff members will: Close and lock interior doors to offices and draw curtains; Gather all other staff, consumers and visitors in the designated areas in your program.

### **B. If the threat is outside the building:**

1. Immediately call 911.
2. All staff and visitors are to gather in the designated areas in the program.
3. All staff members will remain in this posture until notified by the Executive Director or onsite authority that the scene is clear.

**For these measures to remain effective, staff members will not use the silent alarm phrase unless there is a threat, and this information is to remain confidential.**