

Policy Title: Campus and Home & Community Based Client Safety	
Policy Owner: Senior Business Analyst Policy Originated by: Program	Date Written: 10/1/13
Applicable Programs: Community-Based Therapy and Supports	Date Reviewed and Approved by PLT: 3/11/14, 02/17/15, 04/26/16, 5/8/19, 7/22/2020, 4/14/21, 9/22/21
Statutory or Regulatory Citation: Minn. Stat. § 169.685—169.686 Minn. Stat. § 245D.06, subd. 2 Minn. Stat. § 245D.11, subd. 2 (4) Minn. Stat. § 245D.22, subd. 2 Minn. R. 9503.0150	Signature if needed:

Policy:

St. David's Center is committed to providing a safe and secure campus as well as and home and community-based services to program participants, volunteers, visitors, and staff. It is the policy of St. David's Center to ensure campus, home, and community-based safety to program participants through staff compliance with this policy as described below.

St. David's Center expects staff to understand and have an awareness of our entire client safety policy and apply applicable protocols to each site and program as appropriate. In addition, if staff are working at community sites, our expectation is that they are also adhering to any specific site safety standards that are mandated by those sites.

* All procedures in this policy are in effect unless superseded by the Covid-19 Preparedness Plan.

This policy contains the procedures for ensuring the safety of campus and home & community-based program clients and staff in the following incidences:

Childcare Center – see classroom Guidelines Policy and Procedures

Substance Use/Abuse - [Campus Based Programs](#) & [Home and Community Based Programs](#)

Water Safety – [Home and Community Based](#)

Transportation – [Home and Community Based Therapies and Supports](#)

Client Safety – [Home and Community Based Client Safety](#)

Animals - [Campus Based Programs](#) & [Home and Community Based Programs](#)

Client Visit to Staff Homes – [Home and Community Based Programs](#)

Cell Phone Use – [Home and Community Based Programs](#)

Building Security – [Campus Based Programs](#)

Office/Campus Awareness – [Campus Based Programs](#)

Client Safety-Imminent Danger/Dysregulated- non-licensed programs (ECE/PT/OT/School Age/Administration) – [Campus Based Programs](#)
Rehabilitation Therapy Equipment Safety – [Campus Based Programs](#)
Safe Clients Handling – [All Programs](#)

Procedure:

Substance Use/Abuse

Campus Based Programs

If Staff/Providers suspect a parent or caregiver both is impaired/incapacitated and is not able to care for a child due to alcohol use, drug use or for any other reason:

- i. Staff/Providers will not release the child to the parent or caregiver;
- ii. Staff/Providers will contact their supervisor or, if such supervisor is not available, the Program Director.
- iii. If deemed necessary, Staff/Providers may contact the CMT staff on duty (via the front desk), emergency medical personnel, and/or the police.
- iv. If the parent/caregiver exhibits conditions of impairment which Staff/Providers suspect is causing the maltreatment of a vulnerable adult or minor, Staff/Providers will consult the Vulnerable Individuals Policy.

Home and Community Based Programs

- A. If Staff/Provider actually observes the use of an illegal substance and/or the abuse of a legal substance (such as alcohol or prescription medication) in the home, Staff/Provider will immediately consult with the Program Coordinator during office hours or the on-call cell phone. At the Program Coordinator's direction, the procedures in section B below may be followed.
- B. If Staff/provider believes the observed substance use/abuse may result in imminent harm, Staff/provider will call 911.
- C. If Staff/Provider suspects alcohol or drug abuse by the Responsible Party, the Staff/Provider will call the Program Coordinator during office hours or on-call cell phone to consult about the situation.
- D. If the Responsible Party is actually impaired or incapacitated and is not able to care for a client due to alcohol or drug use or for any other reason, alternate care will be secured in one of the following ways:
 - i. If there is a non-impaired adult available to resume care of the client, Staff/Providers may transfer responsibility to that individual.
 - ii. If no non-impaired adult is available to resume care of the client and the Responsible Party exhibits signs of impairment and is unable to care for the client, Staff/Providers will remain with the client and immediately call 911.

- E. Staff/Provider will consult the Vulnerable Individuals Policy and Accident/Critical Incidents Policy and will make reports as required.
- F. If Staff/Provider was not able to speak with the Coordinator directly during the situation, the Staff/Provider will call the client's Coordinator within 24 hours to debrief the situation

Water Safety

- A. St. David's Center does not allow Staff/Providers to take clients swimming unless a lifeguard is on duty.
 - i. Staff/Providers cannot be the designated lifeguard on duty.
 - ii. Swimming areas include local pools, private pools, health club pools, lakes, etc.
- B. Staff/Providers will maintain vigilant supervision when involved in any activities in or around water.
 - i. This includes, but is not limited to, activities such as walking near a lake or fishing off a dock.
 - ii. Staff/Providers must be in the water with clients at all times, even if the client is a good swimmer.
- C. St. David's Center does not allow Staff/Providers to take clients on boats, canoes, paddle boats, rafts, row boats, surf boards, or anything that floats on water. The Therapeutic Recreation Program can contract with trusted vendors to provide this service who provide waivers and ensure water safety measures.

Transportation of Clients – Home and Community Based therapy and supports

- A. St. David's Center will ensure the following regarding safe transportation:
 - i. Equipment used for transportation, including vehicles, supplies, and materials owned or leased by the program, will be maintained in good condition by following the standard practices for maintenance and repair, including any ramps, step stools, or specialized equipment used to help people enter or exit the vehicle.
 - ii. Vehicles are to be kept clean (interior and exterior).
 - iii. Staff will report all potential mechanical problems immediately.
 - iv. Staff will report all potential equipment, supply, and material problems immediately.
 - v. Staff will report all accidents immediately.
 - vi. Staff will report all vehicle maintenance and concerns to the Coordinator.
- B. Employees that drive their personal vehicles for business purposes are required to maintain an active vehicle insurance policy and carry proof of insurance in your vehicle. Each employee is responsible for control of your own personal vehicle, regardless if for business purposes, therefore your personal automobile insurance is primary. Personal insurance deductibles must be paid by the employee as well. (*Driver Safety Policy 5C.*)

C. All staff will follow procedures to ensure safe transportation, handling, and transfers of the person and any equipment used by the person when assisting a person who is being transported, whether or not this program is providing the transportation. When the program is responsible for transportation of the person or a person's equipment, staff will utilize the following assistive techniques:

- i. Staff will assist with seatbelts, as needed, to ensure they are correctly fastened.
- ii. Staff will assist with the use of any ramp or step stools to ensure safe entry and exit from the vehicle.
- iii. Staff will ensure all supplies or equipment, including wheelchairs and walkers or other mobility aids used by a person, specialized equipment using proper vehicle restraints are properly secured before the vehicle is in motion.
- iv. Staff will comply with all seat belt and child passenger restraint system requirements under Minnesota Statutes, sections [169.685](#) and [169.686](#) when transporting a child.
 - a. Infants (under 20 pounds and one year of age) must be in a rear-facing safety seat.
 - b. Children under the age of 9 years must be secured in a safety seat that meets federal safety standards.
 - c. Children weighing less than 80 pounds and/or measuring less than 4 feet, 9 inches in height are to be fastened in an appropriate child safety seat or booster seat.
 - d. Children under the age of 13 years should always sit in the rear of a vehicle, regardless of the airbag technology a vehicle may or may not have.
 - e. All Staff/Providers who serve one or more clients under the age of 9 years are required to complete training in car seat/booster seat safety.
 - f. This training is mandatory for all Foster Care and Waivered Services Staff/Providers.

D. Program vehicles are to be utilized exclusively to for the purpose of transporting persons served by this program, and equipment and supplies related to the program.

1. Staff will be responsible for the supervision and safety of persons while being transported.
2. When the vehicle is in motion, seatbelts are to be worn at all times by all passengers, including the driver and all passengers.
3. Staff must be prepared to intervene in order to maintain safety if a person being transported engages in known behavior that puts the person, the driver, or other passengers at risk of immediate danger of physical harm.

E. In the event of a severe weather emergency, staff will take the following actions:

- A. Monitor weather conditions. Listen to local television or radio or a weather-radio for weather warnings and watches.

- B. Follow directions for the need to change plans and activities or seek emergency shelter.
 - C. Inform passengers why plans and activities have changed. Assist passengers in remaining calm.
- F. All staff are required to follow all traffic safety laws while operating the program vehicle. This includes maintaining a valid driver's license, wearing seatbelts, and obeying traffic signs while operating program vehicle.
- G. All staff are prohibited from smoking, eating, drinking, or using cellular phones or other mobile devices while operating the program vehicle.

Home and Community Based Client Safety Information

- i. Direct Support Professionals are oriented and trained in client specific care, the Community Services and Support Plan Addendum, back-up plan and client information documentation. These documents are accessible to staff in the client's home.
- ii. In the event of an emergency staff will administer care, call 911 if indicated, call guardians, emergency contacts if necessary and then call the emergency on-call cell phone to receive support and/or additional instruction. Their supervisor should be notified by phone as soon as possible. The **Accident, Critical Incidents and Sentinel Events Response & Reporting** policy should be followed.

Animals

Campus Based Programs

- A. Animals may be brought to St. David's Center by staff, clients, or outside agencies/providers for therapeutic activities (must be a therapy dog), classroom visits, field trips, or other events.
- i. Prior approval for an animal visiting must be obtained by program supervisor.
 - ii. Prior assessment and documentation must be obtained by the Volunteer Coordinator.
 - iii. Animals will be kept in enclosures or restrained when they are not being used for their intended purpose.
 - iv. St. David's Staff has the right decline an animal from being allowed on the property.

Home and Community Based Programs

1. Staff Encounters with Animals in Client Homes

- A. Clients are required to restrain all pets in an appropriate manner, even if the animal has no history of biting or aggressive behavior, prior to staff entering a client home, for a

minimum of the first two visits Staff made to the client's home.

- i. The animal must be kept contained for the duration of the staff member's visit to the home.
 - ii. Appropriate restraint is defined as any/all animals being secured in a cage, kennel, unoccupied room, or another suitable enclosure.
- B. If regular visits are made to the client's home and if agreed upon by the Staff person, Staff Supervisor, and the client, the animal can be introduced as deemed appropriate.
- C. If at any time it is reported that the animal is biting, scratching, or acting in an inappropriate manner (including growling, nipping, showing teeth, hissing, etc.), the client must resume the practice of restraining the animal at all times when the Staff person is working in the home, from that time forward.

Client Visits to Staff Homes

- a. Staff are responsible for providing services and coordinating activities according to the client's plan of care and/or goals. These services should be provided in the client's home or community as appropriate. A staff may ask for approval to have a client visit staff's home for some regular activity. This must be pre-approved by the client's program coordinator. It may not be appropriate for some clients.
- b. If this is approved, a waiver must be completed and signed by the client's responsible party prior to services being provided in the staff's home.
- c. Client visits to staff homes are not allowed in some programs.

Cell Phones

- A. Personal cell phone use is for emergencies only during working hours. Use of cell phones for personal phone calls, texting, and social networking is not permitted during work hours. Use of St. David's Center Cellphone should be used in accordance with our IT policy parameters.

Building Security

1. General Procedures

- A. For security purposes, St. David's Center locks all exterior doors, except the main entrance. These doors remain locked at all times to the public.
- B. Guests and clients are expected to enter the building through the visitor entrance, unless stated otherwise in special circumstances.
- C. Fobbed security doors limit access to the building and are secured with a push-code security pad or require a fob for entrance.
- D. All office doors, meeting rooms and treatment rooms are to remain closed and locked when not in use.
- E. Exterior doors adjacent to the program areas have door alarms which will sound when opened.
- F. Deliveries are made at the reception desk and the drivers are given access to the building only when needed.

2. Staff Security Fobs and Keys

A. Staff who spend at least one day per week at St. David's Center (Minnetonka and Harman Center sites) are issued a fob, which allows them access to the employee entrance points and the interior security doors. In addition, staff will be issued a key allowing access to their office location and necessary program rooms.

- i. Staff are expected to carry their fob & keys at all times.
- ii. Offices, meeting rooms, and classrooms should be closed and locked whenever not in use.
- iii. If a staff's fob or keys are lost or stolen, it must be reported immediately to Facilities. The fob will then be de-activated.

3. Client Security Access Codes (Available for family members of program participants/board members/regular volunteers)

- A. Client families that participate in classroom programs are issued a family security code for the duration of participation in those programs.
- B. The responsible adult(s) are the only persons who are given the code.
- C. If the parents/guardian of record are having an alternate person on their pick-up list come to pick up, the parent/guardian must provide that person with the security code.
- D. If the parent or guardian of record forgets their security code, they can present picture identification at the front desk and the Front Desk Staff to receive their code.
- E. If another authorized person comes without the code, Front Desk Staff will check their picture ID, call the classroom to verify they are on the pick-up list, and allow them through the security door.
- F. If a person comes to pick up a program participant and does not have a code or ID, a staff person/supervisor must escort the person to the classroom to ensure that their identity can be verified by staff before releasing them to the client.
- G. It is not permitted to allow someone into the building or pick up a program participant whose identity cannot be verified.
- H. Codes are changed twice per year, or when codes become compromised.
- I. If the security code becomes comprised in any way, we will require that a new security code be issued.
- J. In addition, board members and regular volunteers may be issued security codes.

4. Visitors

- A. Staff should provide the front desk notice if visitors are expected onsite.
- B. St. David's Center visitors are required to check-in with the front desk staff.
- C. They will be issued a visitor badge and asked to sign-in on the visitor registration sheet.

- D. Upon exiting the building, they will then be asked to sign-out on the registration sheet.
- E. When appropriate, we ask that staff escort visitors that are unfamiliar with the building.

5. Playground

- A. The playground will be closed to the public during program hours and closed to all client family visitors during select hours per programming needs.
- B. Client families that would like to utilize the playground during business hours must check-in with the front desk each time they would like to enter the playground. These families will receive:
 - i. A playground visitor badge that must be visibly displayed
 - ii. Sign off that they have received/understand the playground rules and agree to abide by them
- C. St. David's Center reserves the right to ask anyone to leave the playground.

Office/Campus Awareness

It is the responsibility of St. David's Center staff to remain alert and report suspicious activity or potential risks on St. David's Center grounds, and to ensure that safety protocols are followed

1. Grounds

- A. Unsafe conditions or equipment on our campus (icy conditions, tree down on the grounds, loose handrails, dangerous or dead animals, erratic driving, etc.)
- B. An individual walking our grounds who doesn't appear to have a clear purpose
- C. An individual sitting in their car for an extended period of time
- D. An individual exhibiting unusual or concerning behavior
- E. An individual looking into cars/attempting to open car doors
- F. Overall, any behavior that makes staff feel uncomfortable

2. Entering Secured Entrances of the Building

- A. Staff should not allow any unfamiliar individuals to follow them into locked or fobbed doors of the building. Staff should redirect individuals to the public entrance so that the front desk can help them.

3. Unattended Children

- A. If staff view an unattended child, they must stay with that child until it's clear that they have been reunited with another staff member or caregiver.

4. Reporting Procedure

A. Staff encountering or observing any suspicious behavior or unsafe conditions should alert the front desk, providing a detailed description of the individual, activity, or condition

i. The Front Desk Staff should contact the Crisis Management Team (CMT) staff on duty and the Director of Facilities and Risk Management

B. If staff are able and feel the situation is safe enough, we ask that they approach the individual and ask if they need any help in order to verify their place on our campus. Pass on any additional feedback about the encounter to the front desk.

Client Safety-Imminent Danger/Dysregulated- non-licensed programs (ECE/PT/OT/School Age/Administration)

A. Staff observes incident with patron or child that could be dysregulated to the point of physical threat to self or others. Staff can intervene in the following:

i. Notify front desk who will contact CMT

a. With discretion, use de-escalation skills and hands-off tactics to prevent immediate injury:

i. Traffic

ii. Self-harm

iii. Threat to others

b. Call 911

B. Staff should complete the information required within the critical events and communication policies and report personal concerns to supervisor and PTT as applicable to Workplace Safety Policy, as needed.

Rehabilitation Therapy Equipment Safety

A. Therapy equipment and other items with mechanical components or other potential safety hazards will be manually checked at a frequency based on the guidelines provided by the manufacturer.

B. The Clinical Aide will make sure that there is a current Maintenance Log for all therapy equipment that requires routine maintenance.

- i. Supervisory Staff will assist the aide in immediately addressing equipment failure or disrepair once an issue is identified within routine checks.
- ii. Supervisory Staff will review Maintenance Logs in monthly supervision meetings and address any potential ongoing issues in procedure or safety.

C. Equipment and modalities of heat, cold, water and electricity may require specific care and ongoing maintenance. The Clinical Aide will develop a plan for care based on the manufacturer's guidelines and include a summary of that plan in the monthly routine checks. Supervisory Staff will review the plan along with the Maintenance Logs in monthly supervision meetings.

Violation of this Policy or Procedure

No or only partial adherence to this policy or procedure may result in noncompliance with current regulatory requirements and subsequent penalties to St. David's Center. Remediation for violators will include, but not be limited to, disciplinary action up to and including termination depending on the circumstances of the situation at the time.

Violation of this Policy or Procedure

Staff not complying with the above noted procedure may be subject to corrective action.

Reference or Attachments: All Programs

- [COVID-19 Preparedness Plan – Staff Guidance](#)
- [COVID-19 Preparedness Plan – Companion Doc](#)

Reference or Attachments: Home and Community Based Programs

Client Information Sheet - client record

[Medication Administration](#)

[Emergency Medical and Transportation Authorization](#)

[Home Visit Authorization](#)

Reference or Attachments: Office and Campus

Reference or Attachment:

Rehabilitation Therapy Equipment Maintenance Check-Off List (binder maintained in department)

[Playground Rules](#)

[Playground Visitor SOP](#)

[Front Desk Playground Sign-Off](#)