

**MILLE LACS BAND OF OJIBWE
HEALTH AND HUMAN SERVICES POLICY & PROCEDURE**

Department: Behavioral Health-Four Winds Lodge

Policy Number: HHS-BH-FW 4749

Policy Title: Security Management Plan

Attachments:

Revision History:

Revised by/Date:

Approved by:

Date:

Lindsay Misquadace-Berg, Treatment Director (Interim)



7-23-19

Approved by:

Date:

Nicole Anderson, Commissioner of HHS



7-26-2019

POLICY STATEMENT: The Security Management Program is designed to manage the security risks the environment of Mille Lacs Band Four Winds Lodge presents to clients, employees, and visitors. The plan is designed to assure identification of general and high security risks and to develop effective responses. The buildings and grounds of Four Winds Lodge are included in this plan.

PURPOSE: The mission of Four Winds Lodge is working with others; we provide traditional and innovative substance abuse services and assist people in improving their quality of life. Consistent with this mission, Four Winds Lodge has established, and provides ongoing support for, the Security Management Program described in this plan.

The purpose of the Security Plan is to minimize the risk of personal injury or property loss.

PROCEDURE:

I. FUNDAMENTALS

- a) Analysis of security incidents provides information to minimize future occurrences.
- b) Training employees is critical to their performance. Staffs are trained to recognize and report potential or actual incidents to ensure a timely response.
- c) Staffs in sensitive areas are trained about the measures designed for those areas and their responsibilities to assist in protection of clients, visitors, staff and property.
- d) Violence in the workplace is a concern in health for Four Winds Lodge. A policy to address workplace violence is in effect at the Mille Lacs Band of Ojibwe

II. GOALS AND OBJECTIVES

- a) Monitor the building and property to identify and document potential or actual problems.

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- b) Take appropriate and timely action to prevent crime, injury, or property loss.
- c) Provide timely response to emergencies and requests for assistance.
- d) Promptly report crime, fire, injury, or other incidents.
- e) Communicate externally with local, state, or federal law enforcement and other civil authorities and provide for internal communications, as needed.
- f) Provide timely response to reports of security breaches.
- g) Limit access to the grounds, building, and sensitive areas.
- h) Provide training of all new employees about the Security Management Program, including how to report incidents and obtain assistance in an emergency situation.
- i) Review reports of security incidents.
- j) Identify performance improvement opportunities, if applicable.
- k) Conduct an annual evaluation of the scope, objectives, performance, and effectiveness of the program.

III. ORGANIZATION AND RESPONSIBILITY

- a) The CD Leadership Team receives regular reports on the activities of the Security Program from the Safety Committee. The CD Leadership Team reviews reports and, as appropriate, communicates concerns about identified issues and regulatory compliance.
- b) Leadership receives regular reports on the activities of the Security Program. Leadership reviews reports and, provides information to CD Leadership.
- c) The Quality Assurance/Quality Improvement Safety Program Manager advises the Safety Committee regarding security issues which may necessitate changes to policies, orientation, education, or purchase of equipment.
- d) If the Quality Assurance/Quality Improvement Safety Program Manager position should become vacant, the Director of Quality and Compliance is responsible for appointing a qualified individual. The Quality Assurance/Quality Improvement Safety Program Manager reports to the Director of Quality and Compliance.

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- e) The Quality Assurance/Quality Improvement Safety Program Manager and supervisors perform those functions associated with security. For example, they review changes to regulations; assesses needed changes to security equipment; and perform activities essential to implement the Security Program.
- f) The supervisors are responsible for orienting new personnel; and to job and task specific security procedures.
- g) Individual employees are responsible for learning and following programmatic and departmental procedures for security.

IV. PROCESSES OF THE SECURITY PLAN

- a) Security Issues
 - i) All employees are responsible for identifying security issues involving clients, personnel, visitors, and property.
 - ii) Organization wide security procedures are reviewed and revised at least every three years as part of the Safety Committee review process.
- b) Incident Reporting
 - i) Leadership is responsible for managing the security incident reporting process.
 - ii) Security incidents are documented on the Incident Report Form.
- c) Reports of incidents are directed to the supervisors.
 - i) Leadership analyses security incidents on an ongoing basis. The incident analysis is intended to provide an opportunity to identify trends or patterns that can then be used to determine if changes to the Security Program could control or prevent future occurrences.
- d) Identification Program
 - i) The supervisors are responsible for coordinating the identification program.
 - ii) Supervisory personnel are responsible for managing enforcement of the identification program.
- e) Sensitive Areas
 - i) The following areas have been designated as security sensitive areas and have controlled access:
 - (1) Administration
 - (2) Medical Records
 - (3) Medication Room
 - ii) Personnel assigned to work in sensitive areas receive department level continuing education that focuses on special precautions or responses that pertain to their area.

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- f) Emergency Procedures
 - i) The Quality Assurance/Quality Improvement Safety Program Manager, in collaboration with the Leadership Team, is responsible for coordinating the development of emergency procedures for the Security Program. The supervisors are responsible for enforcing program specific emergency security procedures.

 - ii) The supervisors are responsible for maintaining copies of emergency procedures in an accessible location.

- g) Orientation and Education
 - i) New employees participate in New Employee Orientation program which includes information related to the Security Program.

- h) Staff Development is responsible for coordinating the New Employee Orientation program.
 - i) New employees also receive a department-specific Orientation to the department where they are assigned to work. The supervisors are responsible for providing new employees with a department-specific Orientation to the Security Program. The goal of the department Orientation program is to provide new employees with current information regarding area-specific issues, and departmental responsibilities. New employees must complete their department-specific Orientation within thirty days of employment.

- i) Performance Improvement
 - i) The Quality Assurance/Quality Improvement Safety Program Manager, working in collaboration with CD Leadership, is responsible for coordinating the performance improvement process.

 - ii) The Quality Assurance/Quality Improvement Safety Program Manager and CD Leadership collaborate in establishing performance improvement standards to measure the effectiveness of the Security Program.

- j) Annual Evaluation
 - i) The Quality Assurance/Quality Improvement Safety Program Manager is responsible for coordinating the annual evaluation of the plans associated with Management of the Environment of Four Winds Lodge. The Quality Assurance/Quality Improvement Safety Program Manager is responsible for performing the annual evaluation of the Security Program.
 - ii) The annual evaluation uses a variety of information sources including policy and procedure review, Incident Report summaries, Safety Committee minutes and other summaries of activities. In addition, findings by outside agencies such as accrediting or licensing bodies, or qualified consultants are used. The annual review examines the objectives, scope, performance, and effectiveness of the Security program. The findings of the annual review are presented in a narrative report supported by relevant data. The report provides a balanced summary of the Security Program performance over the preceding 12 months. Strengths are noted and deficiencies are evaluated to set goals for the next year or longer term future.

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- iii) The annual review is presented to the Safety Committee for review and approval. The annual evaluation is also distributed to the CD Leadership.

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Internal and/or External References	CAREs -Security Management Plan 2/1/2014
Compliance - Posting Date	7/26/2019
Replaces – Policy Number	
Next Review - Due Date	7/26/2022