

# Workplace Violence Prevention and Response Plan

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## Introduction

The Department of Employment and Economic Development (DEED) recognizes the safety and security of its employees as being of utmost importance and is committed to providing a safe environment that is free from threats and violence in accordance with the Occupational Safety and Health Administration (OSHA) general duty clause.

This Plan outlines methods and actions to be taken to administer the DEED violence prevention plan and the agency violence prevention policy, which defines violence as “the abusive or unjust exercise of power, intimidation, harassment, and/or the threatened or actual use of force which results in or has a high likelihood of causing hurt, fear, injury, suffering, or death.”

Workplace violence generally falls into three categories:

1. A violent act or threat (perceived or real) by a current or former employee, supervisor, or manager; or someone who has some involvement with a current or former employee, such as an employee's spouse, significant other, relative, or another person who has had a dispute with an employee.
2. A violent act or threat (perceived or real) by a customer or someone receiving service from the agency.
3. A violent act by someone totally unrelated to the work environment. The purpose of the visit is to commit a criminal act such as robbery or bombing.

## Goals and Objectives

DEED has a policy of zero tolerance of workplace violence. It is an agency goal to achieve a work environment that is free from threats and acts of violence. DEED objectives are to:

- Identify representatives amongst senior leaders, managers, supervisors and workers who are responsible and accountable for championing, implementing and monitoring workplace violence prevention initiatives.
- Establish a crisis management/chain of command team and ensure their roles and responsibilities are clearly outlined in a procedure (who responds first, who are first complaints reported to, who is next in line to receive the complaint if that individual is not available or does not act upon the complaint).
- Develop awareness among employees and customers about violence in the workplace, its prevention, and the agency violence prevention policy and plan.
- Perform location and program-specific workplace violence risk assessments. Identify and prioritize location-specific safety and physical security needs to be implemented.
- Develop procedures to be used when incidents as defined in the violence prevention policy and plan occur.
- Ensure that facility security plans are communicated to appropriate staff.
- Communicate personal security procedures and avenues for assistance with violence issues to employees.
- Develop and provide education and training opportunities for employees at all organizational levels which includes the following information:
  - Agency violence prevention policy

- Effects of workplace violence
- Prevention of workplace violence
- Supervisory/managerial responsibilities
- Employee responsibilities
- Incident response procedures
- Develop procedures to continually monitor and evaluate the effectiveness of the DEED violence prevention policy and plan.

## **Program Elements**

### **Leadership Support and Worker Participation**

DEED has strong support and commitment from senior leadership to provide needed resources and motivation for employees to become involved in and prioritize the successful implementation of a workplace violence prevention program.

### **Coordination with DEED Program Areas, Partners and Stakeholders**

#### **Safety and Security**

The Occupational Safety and Health Act of 1970 mandates that all employers have "a general duty to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm," which is applicable to workplace violence. Safety and security personnel can offer important ideas to minimize the risk for potential hazards related to workplace violence. Therefore, DEED's safety and security personnel play a major role in the development and management of the agency's workplace violence prevention and response program.

#### **Business Continuity**

Coordination between continuity planning and workplace violence planning takes into consideration certain types of workplace violence incidents that are disruptive enough for partial activation of DEED's Continuity of Operations Plan (COOP). Therefore, DEED's Agency continuity director is included in the workplace violence prevention and response planning process.

#### **Human Resources/Labor Relations**

DEED's violence prevention program planning takes into consideration the important role that Human Resources plays with ensuring a workplace where employees feel valued and managers have the tools to foster an environment in which employees can succeed. Labor relations ensures compliance with the terms of collective bargaining agreements and offers union representatives an opportunity to provide input to identifying gaps in DEED's workplace violence prevention program.

## **Diversity and Equal Opportunity**

DEED understands the importance of creating a broader culture of inclusion and embracing diverse cultures across the agency. DEED strives to ensure that employees and customers are treated fairly and equitably and recognizes that in doing so it reduces the potential for threats and violence in the workplace. DEED's ADA coordinator plays an important role in the planning process to ensure individuals with disabilities will be accommodated in the event of a workplace violence incident.

## **Partners and Stakeholders**

Elements of DEED's violence prevention and response plan are shared with DEED program partners and stakeholders (such as landlords, contractors and vendors) who may be impacted by a violent or threatening incident. Site-specific procedures within the plan must be coordinated with similar procedures affecting employees under other jurisdictions.

## **Violence Prevention Policy**

DEED has a violence prevention policy that lays out DEED's violence prevention and response plan including the firearms and weapons policy, and links to the violence/threat report form, violence prevention and response training, central office violence prevention and response procedures and field office site-specific procedures template.

## **Risk Assessment**

A workplace violence risk assessment lead has been appointed for the agency and a process is in place for assessing risk to specific work locations and program areas, so that prevention and control measures can be developed and implemented. Ongoing risk assessments are performed through routine safety and security audits, and in response to the awareness of violent or threatening events impacting a specific work location or neighboring community. Patterns of threats or violence identified through analysis of the incident report tracking system is also used to assess risk and develop strategies for preventing and responding to workplace violence.

## **Methods for Recognizing and Reporting Threats and Violence**

A method for recognizing potential threats and for reporting threats and violence has been established for employees to report all incidents falling under the definition of violence as stated in the agency violence prevention policy. The electronic report form is immediately reviewed by designated personnel to determine need for assessment by members of DEED's threat assessment team.

## **Threat Assessment Team (TAT)**

### **Purpose**

To assess apparent threats to individual employees and their workplaces. To recommend or deliver responses to specific threats. To develop subject matter expertise to advise leadership on security measures that need to be taken. To perform follow up measures to identify need for corrective actions and ensure resolution to prevent future similar occurrences.

## **Team Membership**

The TAT is made up of a multidisciplinary team of internal members that can be called on to provide various expertise, depending on the situation. Internal members include representation from human resources, safety, security, labor relations, business continuity, diversity and equal opportunity, general counsel and bargaining unit members. The team also consults with outside experts, such as law enforcement, security personnel, and Minnesota, Management & Budgets' Employee Assistance Program (EAP), legal counsel, labor relations, enterprise business continuity.

## **Threat Assessment Process**

A threat assessment decision tree was developed to assist with determining steps to be taken and contacts to be made to respond to types and levels of threats and violence.

## **Incident Tracking**

Incidents are tracked using a tracking system that interfaces with our electronic report form, so that patterns can be identified, risk assessments can be performed, and strategies for preventing future incidents can be determined.

## **Incident Management**

DEED has an agency-wide incident management team that responds to certain emergency situations. Field office managers are also advised to establish incident management teams for immediate response to situations involving their site and receives assistance with establishing incident management teams and response plans.

## **Emergency Notification**

DEED uses an emergency notification system to quickly notify employees during crisis situations that might impact them and has an emergency notification phoneline that employees can call to obtain important emergency-related information that would be important for them to know.

## **Role of the Employee Assistance Program (EAP)**

DEED consults with EAP's Organizational Health team for guidance with managing behavioral risks to reduce the potential for threats and violence, and requests consultation, coaching and onsite response to disturbing or disruptive events to facilitate team recovery.

## **Physical Security**

DEED recognizes the importance of providing better protections for employees and visitors by identifying high-risk areas in the buildings where potential problems or emergency situations might occur. This is accomplished by performing physical security surveys of all locations. A physical security survey tool was developed with the assistance of the Minnesota Department of Labor and Industry violence prevention specialist to use to assess each work location. Ongoing assessments are performed according to predetermined schedule using a software application which tracks compliance and identifies and prioritizes corrective actions and associated needs for improvement to minimize the risk of threats and violence.

## **Law Enforcement and Security Assistance**

A guidance tool was developed and implemented for determining protocol regarding when to call police and situations for which law enforcement or security personnel may be able to assist. Location managers are encouraged to meet with local law enforcement to discuss ways in which they may assist with violence prevention and response, to request guidance for security measures that can be taken, and to request personal safety and security training for staff.

## **Site-Specific Procedures**

A site-specific violence prevention and response procedures template was developed to assist field office managers with developing procedures for their location. The template includes the following:

- Emergency Contacts and Designated Responsible Persons List
- Active shooter/violent intruder response
- Handling customer agitation/threats
- De-escalation techniques
- Methods for recognizing warning signs and violence-threat reporting
- Safety procedures for working in the field
- Violent incident follow-up
- Role of the Employee Assistance Program (EAP)

## **Domestic Violence Procedures**

DEED is responsive to situations involving domestic violence, which effect the workplace and has identified resources and response measures to best ensure employee and workplace safety.

## **Workplace Violence Training**

A comprehensive workplace violence prevention and response training program was developed for all DEED managers, supervisors and employees to attend. Following are the major components of the training:

- Active shooter/violent intruder
- Situational awareness/personal safety
- Emergency procedures & drills
- Warning signs & reporting methods

- De-escalation technique & team exercises
- Safety Tips for Working in the Field
- Workplace climate
- Customer Code of Conduct for Customer-Facing Employees

## Limiting Violence from External Sources

### Customer Service Policies

DEED divisions providing customer service have developed policies and procedures which clearly define expectations of customer behavior and conduct.

Examples include:

- Customer Code of Conduct for CareerForce Locations, which includes violation levels and appropriate response measures.
- Procedures for dealing with customers, especially in difficult or hostile situations and employee training on those procedures
- Procedures for handling telephone communications
- Training on the Customer Code of Conduct

### Complaint Processes for Customers

Agency divisions have developed procedures for customers to provide feedback on the quality of services provided, and a complaint process for customers to use when services are perceived to be unsatisfactory or in need of improvement.

## Reducing the Potential for Internal Workplace Violence

### Agency Policies and Complaint Procedures

Since violence in the workplace may take various forms, several agency policies are related to this issue and provide complaint processes for employees to use. These include violence prevention, non-discrimination and harassment, code of conduct and ethics and respectful workplace.

### Creating a Low-Risk Environment

Agency managers and supervisors are expected to promote positive behavior and to lead by example in the courteous and professional treatment of employees and customers. Emphasis will be placed on creating a workplace where established standards of conduct are clear, communicated, and consistently enforced, and where discipline is used fairly and appropriately to deal with instances of unacceptable behavior.



## **Awareness**

DEED HR will promote awareness of the agency violence prevention policy and plan. Methods include:

- Working with the State Employee Assistance Program or other security when available for a particular worksite in developing information for employees related to personal security and violence prevention.
- Developing or obtaining publications and/or brochures on violence prevention topics.
- Developing other activities to promote awareness of violence prevention.
- Presenting training to all staff that included methods for reporting incidents, violence prevention strategies, and response procedures.
- Developing a communication checklist for managers and supervisors to use as a guide for communicating workplace violence-related policies, procedures, and resources designed to ensure employee safety.

## **Policy and Plan Implementation**

### **Violence Prevention Responsibilities**

#### **Employees will:**

- Abide by and promote the DEED policy of zero tolerance of violence in all contacts with coworkers, supervisors, and customers.
- Be familiar with and follow location-specific workplace violence procedures.
- Be familiar with and adopt the workplace violence prevention practices outlined in the guidance tools available from the safety and wellness section of the employee internal web.

#### **Managers and supervisors will:**

- Promote positive behavior and lead by example, by treating employees and customers with respect and dignity.
- Emphasize creating a workplace where established standards of conduct are clear, communicated, and consistently enforced, and where corrective action, including discipline, is used fairly and appropriately to deal with instances of unacceptable behavior.
- Take immediate action to resolve or stabilize violent situations in the workplace and protect people from harm.
- Be familiar with and use the manager and supervisor violence prevention and response guidance tools available on the safety and wellness section of the employee internal web.

#### **DEED management will:**

- Offer employee training opportunities to increase their awareness of violence in the workplace issues. Training will include information on responding to and reporting violence-related incidents and assistance with maintaining a violence-free workplace.

## **Compliance**

Managers are responsible for informing employees of this and plan related policies and procedures and for enforcing compliance. An employee communications checklist was created to inform managers of what must be communicated to employees. A copy of the workplace violence prevention policy and related procedures and resources are available on the employee internal webpage.

## **Violations**

Alleged violations of the policy and plan will be investigated. Employees found to have violated the provisions of the policy and plan will be subject to corrective action. This action may consist of discipline up to and including discharge.

## **Program Evaluation**

DEED Human Resources Office will provide advice and council including follow-up to ensure the issue is appropriately resolved and future issues avoided. The violence prevention policy and plan will be reviewed annually.