

Administrative guidance/requirement i-admin13-38

Workplace violence prevention and response plan

Type: Safety

Owner: Emergency Preparedness Management Team

Effective date: June 2, 2025

Guidance/requirement statement: Minnesota Pollution Control Agency (MPCA) has zero tolerance of workplace violence and works to achieve a work environment that is free from threats and acts of violence.

Purpose: Purpose

This Plan outlines methods and actions to be taken to prevent and plan for potential incidents of workplace violence at the MN Pollution Control Agency (MPCA). It is part of our adoption of *HR/LR Policy #1444: Workplace Violence Prohibited*. Any form of threatening or violent behavior by an employee or a third party in the workplace or threatening or violent behavior that affects the workplace is strictly prohibited and will not be tolerated.

Workplace violence is defined as follows: “Behavior that results in the actual or reasonably perceived threat of physical or emotional harm to an individual or property.”

Workplace is defined as follows: “A location where employees perform job duties. The location need not be a permanent location, physical building, or state owned/leased property.”

Workplace violence generally falls into three categories:

1. A violent act or threat by a current or former employee; 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 by a customer or someone receiving service from the agency. See Appendix E: External threats in the St. Paul office emergency plan.
3. A violent act by someone totally unrelated to the work environment, with the intent to commit a criminal act such as robbery or bombing.

Goals and objectives

MPCA 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. MPCA objectives are to:

- Develop awareness among employees and customers about violence in the workplace, its prevention, and the agency violence prevention plan.

- Develop and provide education and training opportunities for employees at all organizational levels which includes the following information:
 - Agency violence prevention plan
 - Effects of workplace violence
 - Prevention of workplace violence
 - Supervisory/managerial responsibilities
 - Employee responsibilities
 - Incident response procedures
- Develop procedures to be used when incidents, as defined in the violence prevention 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 procedures to continually monitor and evaluate the effectiveness of the violence prevention plan.

Limiting violence from external sources

Customer service policies

Agency division leaders should develop customer service guidelines and communicate these to all employees during division meetings. Guidelines should define clear expectations of behaviors and interactions for employees, customers, and guests in the workplace environment. Examples of specifics include:

- Procedures for dealing with customers, especially in difficult or hostile situations.
- Standards of conduct for customers and employees, e.g., work rules.
- Procedures for handling telephone communications.

Complaint processes for customers

Agency division leaders should share procedures for customers to provide feedback on the quality of services provided. Such procedures should include a complaint process for customers to use when services are perceived to be unsatisfactory or in need of improvement.

Communication

Managers and supervisors should communicate such policies and procedures to employees through regular staff meetings and/or written correspondence. Staff should be asked for suggestions and ideas to keep office policies and procedures up to date. Customers should also be made aware of any policies and complaint processes that relate to the services they receive from MPCA.

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 policies are available on the Lorax [Policies and guidance](#) page.

- [Zero tolerance of the workplace \(i-admin8-19\)](#)
- [Statewide harassment and discrimination prohibited – HR/LR policy 1436 \(i-admin8-20\)](#)
- [Sexual harassment – HR/LR policy 1329 \(i-admin8-24\)](#)
- Complaints/Grievances - (Coming soon)

- Safety & Physical Security – [Building access \(i-admin8-09\)](#)
- [MMB HR/LR Policy 1445 Code of Ethical Conduct \(mn.gov\)](#)

Statewide policies and guidance

- Minnesota Management and Budget; HR/LR Policy #1329 Sexual Harassment Prohibited: <https://mn.gov/mmb-stat/policies/1329-sexualharassment-prohibited.pdf>
- Minnesota Management and Budget; HR/LR Policy Prohibition of Drug and Alcohol Use by State Employees <https://mn.gov/mmb-stat/policies/1418-DrugAndAlcoholPolicy.pdf>
- Minnesota Management and Budget; HR/LR Policy #1432 Respectful Workplace: <https://mn.gov/mmb-stat/policies/1432-respectful-workplace-policy.pdf>
- Minnesota Management and Budget; HR/LR Policy #1436 Harassment and Discrimination Prohibited: <https://mn.gov/mmb-stat/policies/1436-harassmentdiscriminationprohibited.pdf>
- Minnesota Management and Budget; HR/LR Policy #1444 Workplace Violence Prohibited: <https://mn.gov/mmb-stat/policies/1444-workplaceviolenceprohibited.pdf>

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.

Location-specific violence prevention program development

Managers and supervisors should develop location-specific procedures for preventing and responding to threats and violence. As appropriate and necessary, training shall be geared towards office specific locations or be program specific for staff to glean from their specific work environment.

Resources for developing location-specific violence prevention programs and other guidance tools can be obtained from MPCA workplace health and safety webpage: [Workplace health and safety | The Lorax](#).

Coordination with safety and wellness programs

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.” The main components to any effective safety and health program also apply to preventing workplace violence: a) management commitment and employee involvement, b) worksite analysis, c) hazard prevention and control, and d) safety and health training.

MPCA has a Wellness and Health Promotion committee that promotes health and wellness through resources from MMB and communicates to staff using the PCA2Day email newsletter.

Awareness

MPCA HR will promote awareness of the agency violence prevention plan. Methods include:

- Working with agency Safety officers, the State Employee Assistance Program, or 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.

Incident procedures and reporting

All incidents falling under the definition of violence as stated in the agency plan should be reported on the Safety issue report form on the workplace health and safety webpage.

Supervisors should develop plans for reporting and responding to situations of a violent or potentially violent nature and communicate these plans to employees. Examples of procedures could include:

- How to report to security if available at a particular worksite
- When to call 911 or local law enforcement
- Who to call when the supervisor/manager is out of the office
- What actions an employee or employee(s) could take to get away from a potentially violent situation
- What should be done after the occurrence of a violent situation, e.g., referral to Employee Assistance Program, temporary relocation of an employee(s), approved time off, etc.
- MPCA has an active Internal Emergency Assessment Team (IEAT) that triages emergencies as they occur and will formulate response plans accordingly.

Coordination with partners

The MPCA violence prevention plan should be communicated to all partners within the seven office locations. Specific procedures in the plan shall be coordinated with similar procedures affecting employees in a specific regional office. Training will be tailored when feasible for each office and their partners as appropriate.

Evaluation

The MPCA Human Resources office will provide advice and counsel including follow-up to ensure the issue is appropriately resolved and future issues avoided. The violence prevention plan will be reviewed annually along with safety.

Plan Implementation

The MPCA violence prevention plan shall be distributed to all employees, posted on the Lorax, and available at the HR office. Managers and supervisors will be responsible for informing employees of this plan and for enforcing compliance.

Employees found to have violated the provisions of the plan will be subject to appropriate corrective action up to and including discharge.

Violence prevention responsibilities

Employees will:

- Abide by and promote the MPCA policy of zero tolerance of violence in all contacts with co-workers, 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 on the Lorax intranet website.

Managers and supervisors will:

- Promote positive behavior and lead by example through modeling appropriate behavior, 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.

- Treat all reports of violence or threats of violence seriously, regardless of the individual or behavior involved.
- 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 Lorax.
- Understand that knowingly participating in or tolerating workplace violence or retaliation against employees or customers making a report are subject to discipline up to and including discharge.

MPCA senior leadership will:

- Model the importance of proactive workplace violence prevention and response.
- Offer training opportunities to employees to increase their awareness of violence-in-the-workplace issues. Training will include information on responding to and reporting violence-related incidents as well as assistance in maintaining a violence-free workplace.

Training

- Training will be periodic or as requested by business units. Training may include presentation, virtual and/or hands-on scenarios and be location specific for the seven office locations when feasible.

Appendix B: External threat notification procedure

The External Threat Notification Procedure is mandatory and will be used when the MPCA, or member(s) of its workforce, receives a threat of a violent or hostile act(s) against a non-MPCA entity. Threats may be perceived or actual, implicit or explicit, and may be received verbally or via Postal Service, email, or fax.

The following steps will be taken when an external threat is received:

All staff

- Contact 9-1-1 and provide all information associated with the threat.
- Retain any evidence of the threat (voicemails, letters, emails, faxes, etc.).
- Notify the Safety Office as soon as possible and provide all evidence to the Safety Officer **(651) 757-2772**.

Safety Officer

- Review threat for validity
- If valid, notify the following:
 - Incident Commander,
 - Deputy Commissioner, and
 - Minnesota Fusion Center **(651) 793-3730**.
- If the threat contains a specific target(s), notify the nearest Regional Office Manager, provide all evidence and details, and advise notification of local law enforcement officials.

Regional Manager (nearest the target of the threat)

- Receive and review all information provided by the Safety Officer.
- Notify local law enforcement of the threat and provide any information or evidence, as requested.