




# Policy and procedure

Approved: , Executive Director

Subject: Workplace Threats and Violence

Effective date: Jan. 6, 2023

Questions: Randy Arnold, Human Resources Director

## Purpose

DRCOG promotes a safe working environment free from workplace violence. All DRCOG employees are responsible for making their personal safety and the safety of others a priority.

## Policy

DRCOG maintains a **zero tolerance** policy regarding any form of workplace violence. DRCOG will not tolerate violent or threatening conduct and will impose disciplinary action appropriate to the nature and severity of the violation, and when appropriate, referral for prosecution by legal authorities.

Workplace violence is defined as any conduct in the workplace that is meant to harm, cause fear in, or intimidate another, including but not limited to:

1. Physical acts or physical threats against individuals or their property or DRCOG property.
2. Direct or veiled threats, profanity, or vicious or abusive statements.
3. Written threats, profanity, vicious cartoons, notes, email, or other written or symbolic conduct.
4. Stalking (unwanted pursuits).
5. Possession of any weapon while on DRCOG premises other than a lawful non-lethal personal defense weapon such as mace or pepper spray. A weapon, capable of producing death or serious bodily injury which in the manner it is used or intended to be used, can include:
  - a. A firearm, whether loaded or unloaded.
  - b. A knife.
  - c. A bludgeon.
  - d. Any other weapon, device, instrument, material or substance intended to cause harm, whether animate or inanimate.

## Procedures

Three separate procedures (for employees, for supervisors/division directors and the threat and violence assessment team) for dealing with workplace threats or violence are outlined below:

## Employees' role

Employees are required to **promptly** report any suspected violations of the Workplace Threats and Violence Policy, or other disturbing circumstances that may raise a concern for safety, including knowledge of a concealed weapons permit, to their supervisor, division director, Human Resources and/or a member of the Threat and Violence Assessment Team to enable them to conduct a confidential investigation. Members of the Threat and Violence Assessment Team are the Human Resources division director, executive director and legal counsel, if warranted. Such conduct should be reported whether the conduct is by a DRCOG employee; a spouse, significant other, or other person with a present or former personal relationship to a DRCOG employee; or a client, vendor, contractor, visitor, member of the public or other person.



Retaliation is prohibited against any employee who, in good faith, reports a possible violation of the Workplace Threats and Violence Policy or cooperates in an employer-led investigation.

Any employee with a restraining order that includes the DRCOG premises shall promptly provide Human Resources with a copy of the restraining order and a photograph of the person named on the restraining order, if available. Human Resources will provide the information to the front desk administrative assistant.

Making knowingly false reports or accusations of workplace violence is prohibited, and will result in disciplinary action. However, making a report when an employee is uncertain about whether a particular conduct might fall within the prohibited conduct listed above is not a false report. An employee should not hesitate to call a matter to a supervisor's attention if it is of concern to the employee, even if the employee is not certain whether it is prohibited conduct.

## Imminent threats

In the event of a violent act in progress or imminent threat of violence at the DRCOG offices, employees should take whatever measures are necessary to protect themselves from physical harm — **get safe!** If guns or other lethal weapon(s) are involved, employees should try to escape from the immediate area where the violent act is occurring by leaving the floor and building via the fire escape stairwells and take cover. If a violent incident should occur, employees need to congregate at the same location used for fire evacuations, Halcyon House at 1955 Arapahoe St, Denver, CO 80202 (at the corner of 19th and Arapahoe).

Do not return to the building until an "all clear" signal is given (by management, law enforcement or building management) that it is safe to return to the office.


If safe to do so, law enforcement should be contacted by calling 911. If time and safety permit, notify fellow employees of the situation. To use the public address system, open the WebEx app on your computer and dial 2070. Listen for a beep, then start talking. Speak loudly enough so you can be heard over the white noise. An example of a message might be: "Active shooter by the copy center on the east side of the 7th floor." Make the message short and quick. The public address system should not be used for any other purposes than what is outlined above (unless so directed by building management or the executive director). Additionally, if time permits, report the incident to building management by calling 303-293-8388..

## Supervisors' and division directors' role

Conduct or circumstances that raise concern about possible violence can be reported from various sources, within or outside the organization. Often, such reports are received by supervisors, division directors, Human Resources staff or other designated personnel. It is important that these personnel, who are likely to receive first reports, have a basic understanding of circumstances and warning signs that point to potential violence and be aware of their need to forward reports to the Threat and Violence Assessment Team. The executive director or Human Resources should immediately be informed of any concern of potential or actual threats and/or acts of violence.

A violent act is almost always preceded by a number of warning signs or changes in behavior. Since behavior changes can be subtle, it is important to observe behavior carefully. Consider the behaviors below as a whole — don't focus on one isolated behavior. Always document all behaviors that contribute to credible concern. This includes comments made to the public, supervisory staff or other employees, including threats — either written or verbal, or behaviors that seem either inappropriate or threatening.

These warning behaviors may include:

- a. Making jokes or offensive comments about violent acts.
  - b. Threats, threatening behavior, frequent aggressive outbursts or excessive displays of temper.
  - c. A history of threats or violent acts.
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- d. Ominous fascination with weapons and/or references to weapons, violent media content or violent events.
- e. Verbal abuse of coworkers and customers, or harassment through phone calls or emails.
- f. Bizarre comments or behavior, especially if it includes violent content.
- g. Holding grudges, inability to handle criticism, habitually making excuses and blaming others.
- h. Chronic, hypersensitive complaints about persecution or injustice.

Such behaviors are often accompanied by job performance problems, such as inconsistent productivity, excessive tardiness and absenteeism, and poor relations with coworkers. The potential for a violent act may escalate if, as a result of his or her conduct, the employee then faces the stress of termination, other disciplinary action or is made to feel devalued.

This list is not intended as an evaluation tool to assess the stability of an employee, but is simply a summary of behaviors historically displayed by individuals who have committed violent acts. If a change in an employee's behavior occurs that fits the overall pattern of this list, it is a cause for concern. Do not attempt to determine whether or not an employee is going to become violent based on the behavior observed; leave this assessment to the Threat and Violence Assessment Team.

Dealing with threats or violence by a person other than an employee (such as a spouse or significant other, or a person with a present or former personal relationship with an employee) poses distinct challenges. Although the responsibility for identifying such a person rests with the employee, supervisors and division directors should be alert to circumstances (such as breakup, divorce discord, signs of injury, domestic violence) that can be warning signs.

If an employee provides notification of a restraining order that encompasses DRCOG premises, or informs DRCOG of a person that the employee wants to have excluded from DRCOG premises, it is critical to respond promptly. In the event any supervisor or division director learns of such a situation, it is his or her responsibility to inform Human Resources staff or the executive director immediately so the situation can be evaluated.

Any incident of observed or reported conduct in violation of the Workplace Threats and Violence Policy should be documented and forwarded immediately to the Threat and Violence Assessment Team. Additionally, all behaviors that contribute to credible concern or seem either inappropriate or threatening should be documented. Follow the "four Ws" by documenting:

1. **Who** is the perpetrator of the conduct, and who else was present to witness the incident?
2. **What** exactly happened? Concentrate first on obtaining an accurate description of the facts: the events, the actions, the words, the gestures, the expressions and where the parties were in relation to one another as the incident happened.
3. **When** did the incident occur? If other smaller or preceding incidents led up to the main incident being described, when did those incidents occur?
4. **Where** did this incident happen?

## Threat and Violence Assessment Team's role

The Threat and Violence Assessment Team, consisting of the executive director, Human Resources division director and legal counsel, if warranted, is responsible for receiving, investigating, tracking and resolving reports of circumstances that raise a concern for employee safety. This team also is responsible for the ongoing review of incidents to identify patterns and develop prevention strategies.

The effort of managing a threat of violence will typically involve a number of stages, beginning when the Threat and Violence Assessment Team receives a report of threatening behavior or violent conduct by an employee or a customer, visitor or intruder. If the initial report indicates an emergency with a violent act already occurring or appearing imminent, the appropriate managers will carry out an immediate emergency response by calling 911 and taking steps to get other employees away from the violent event and out of danger, such as by evacuating the floor or building.

If the initial report does not call for immediate emergency action, the team may proceed through the following steps:

1. Obtain additional information and conduct a preliminary risk evaluation. Upon receipt of the incident report, a member of the Threat and Violence Assessment Team will be designated to gather additional information and reach a preliminary assessment of the level of risk posed by the behavior or circumstances in question. The first task is to determine and document, to the extent possible, the “who, what, where, when, and why” of the incident.
2. The second step is to evaluate the risk of the violent act. The following are some key questions aimed at identifying risk factors:
  - a. What is motivating the employee to make the statements or take the actions that led to concerns about workplace and employee safety?
  - b. What has the employee communicated to anyone concerning his or her intentions, whether by threats or other disclosures or actions?
  - c. What interest has the employee shown in violence or its justification?
  - d. Has the employee engaged in planning and preparation for violence, such as approaching a person or site, harassing, or stalking a person?
  - e. Does the employee have a current or past history of a mental disorder or substance abuse? Has the employee exhibited symptoms of paranoia, delusional ideas, hallucinations, extreme agitation, despondency, or suicidal tendencies, especially with any violent content? Has he or she ever acted on such beliefs?
  - f. What kinds of serious oppositional or counter-productive attitudes or behaviors does the employee present in the workplace? For example, does the employee blame others or exhibit a strong sense of entitlement, defensiveness, self-centeredness, or intolerance of others' rights?
  - g. How does this employee manifest any anger problems, and how focused is this anger on other employees in the workplace?
  - h. Has this employee experienced (or is he/she likely to in the near future) any serious personal or financial stressors, such as divorce, custody disputes, job or status losses, or deaths in the family? Does he/she show poor coping skills in reaction to such events?
  - i. What is the employee's known history of serious interpersonal conflict, violence, or other criminal conduct, in domestic or work settings?
  - j. What is the nature of any organizational, supervisor, or work group problems that have contributed to, provoked, or exacerbated the situation, and how do those problems influence the employee's perception of his or her circumstances?

The second group of key questions aims at disclosing factors that may lower the risk of violence:

- a. Does the employee have positive, valued family or other personal attachments?
- b. Has the employee expressed genuine remorse for making threats or engaging in the behavior that has generated a concern for safety?
- c. Has the employee responded positively to defusing or limit-setting efforts by others?
- d. Has the employee engaged in appropriate problem solving or sought professional treatment or legal recourse as a way to manage the situation or problems at issue?

When the initial risk assessment is complete, situations that are evaluated as presenting no or low risk of violence are referred for follow-up and resolution outside the threat management process, for example through Human Resources channels. All other situations are further reviewed by the Threat and Violence Assessment Team.

## Initial actions by the Threat and Violence Assessment Team

When an initial risk assessment indicates a greater than “low risk of violence,” the Threat and Violence Assessment Team should take some initial steps based on the data available at the time and its preliminary opinion regarding risk level. Team members may:

- Collect further data.
- Confer with other, appropriate organizational members.
- Consult with legal counsel or external violence risk assessment and risk management specialists.

Legal oversight is often necessary or desirable, particularly with respect to activities such as managing various aspects of an employment relationship, devising flexible separation arrangements, securing a restraining or protective order, and shaping appropriate incident-related communications.

## Concluding an incident

When a situation is judged to have been safely resolved, remaining issues can be referred to the applicable supervisor, division director, Human Resources staff or other appropriate organizational authorities. Once an incident is over, the Threat and Violence Assessment Team should carefully review what happened, reexamining both the circumstances of the precipitating event and the response. The purpose of the review will be to determine if any change in workplace conditions or policies or in violence response procedures could help avoid similar incidents in the future, or manage them more effectively if any occur. It is important to keep a log of individuals who have been violent or posed a threat, in the event that another issue involving the same individual occurs.

## Responding to a violent incident in the workplace

A violent event, particularly one that involves death or serious injury or a prolonged period of intense fear, has longer-range consequences that should also be considered in incident response planning.

The agency's Employee Assistance Program (through Mutual of Omaha at 800-316-2796 or [mutualofomaha.com/eap](http://mutualofomaha.com/eap)) is available to help with any emotional impact on employees and the kinds of support and leadership that can restore a feeling of security and a routine work atmosphere.