Any form of violence in the workplace can devastate your safety culture. This course introduces the student to an important seven-step process of developing an effective workplace violence prevention program. This course covers various topics, including initial assessment, written policy development, prevention measures, training, reporting and investigation, post-incident follow-up, and program evaluation. When workplace violence is reduced and eliminated, you are sure to see an increase in employee morale and a decrease in employee turnover, which positively affects your bottom-line.
OSHAcademy Course 720 Study Guide

Preventing Workplace Violence

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Contact OSHAcademy to arrange for use as a training document.

This study guide is designed to be reviewed off-line as a tool for preparation to successfully complete OSHAcademy Course 720.

Read each module, answer the quiz questions, and submit the quiz questions online through the course webpage. You can print the post-quiz response screen which will contain the correct answers to the questions.

The final exam will consist of questions developed from the course content and module quizzes.

We hope you enjoy the course and if you have any questions, feel free to email or call:

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Course Introduction

This course provides you with recommendations on steps to consider in developing a workplace violence prevention program to reduce the hazards of workplace violence. These are guidelines only. Safety Insight does not intend to create rules specific to violence in the workplace. While not every suggestion may be appropriate for all organizations, these recommendations provide an excellent means for quickly assessing the state of an organization’s current policies and practices.

Workplace violence — a preventive approach

Across the nation, violence in the workplace is emerging as a significant occupational hazard. All too frequently, employees become victims of violent acts that result in substantial physical or emotional harm. For injured or threatened employees, workplace violence can lead to medical treatment, missed work, lost wages, and decreased productivity.

For many occupations, workplace violence represents a serious occupational risk. Violence at work can take many forms: harassment, intimidation, threats, theft, stalking, assault, arson, sabotage, bombing, hostage-taking, kidnapping, extortion, suicide, and homicide. Homicide is the second leading cause of all job-related deaths and the leading cause of such deaths for women, according to the Bureau of Labor Statistics (1994). For each murder, there are countless other incidents of workplace violence in which victims are threatened or injured.

The Law

The Occupational Safety and Health (OSH) Act's General Duty Clause requires employers to provide a safe and healthful working environment for all workers covered by the OSH Act of 1970. Failure to implement the suggestions mentioned in this document is not in itself a violation of the General Duty Clause. If there is a recognized violence hazard in the workplace and employers do not take feasible steps to prevent or abate it, employers can be cited.

The Importance of Planning

The central theme which emerges from the shared experience of these specialists from different disciplines is this: While some cases of workplace violence can be dealt with swiftly and easily by a manager with the assistance of just one specialist or one department. Most cases can be resolved far more easily and effectively if there is a joint effort which has been planned out in advance by specialists from different disciplines.
Be prepared

Many who have never experienced workplace violence think, "I don't need to worry about this" or "It would never happen in my department." Violent incidents are relatively rare, but they do occur, and lives can be lost. A little preparation and investment in prevention now could save a life. There is no strategy that works for every situation, but the likelihood of a successful resolution is much greater if you have prepared ahead of time. This course is designed to help you do that: Be prepared for violence in the workplace.

Employers can take several steps to reduce the risk of legal liability. For example, they can implement careful hiring, employee evaluation and discipline procedures, and adopt appropriate workplace security procedures; and adopt appropriate workplace security procedures. However, employers must be careful not to violate laws protecting employee privacy rights, civil rights, or rights created by the Americans with Disabilities Act. Employers conducting workplace violence risk assessments may want to consult with legal counsel.

The benefits of a joint effort

The experience of companies who have developed programs has shown that managers are more willing to confront employees who exhibit disruptive and intimidating behavior when they are supported by a group of specialists who have done their homework and are prepared to reach out to others when they know a situation is beyond their expertise. This team approach promotes creative solutions and much needed support for the manager in dealing with difficult situations that might otherwise be ignored.
Module 1: Initial Assessment and Security Review

Introduction

There are many different approaches companies can take in developing plans to prevent workplace violence. An approach that works well in one company may not be suitable for another. This module outlines some broad guidelines that can help companies in analyzing their current ability to handle potentially violent situations and filling in any skills gaps that exist.

Conducting an initial assessment through surveys, checklists, and analysis of their results can be a great help in determining the effectiveness of current policies/procedures, and the company’s ability to handle potentially violent situations is an important and necessary effort. Looking at previous incidents that have occurred at your company and evaluating how effectively they were handled is a good way to start.

Form a Planning Group/Threat Response Team

Successful company violence prevention programs usually start by forming a planning group that may also act as a threat response team that more directly response to incidents. The planning group assesses and evaluates the company’s current ability to handle violent incidents and recommends ways to strengthen its response capability.

Typically, members of a planning group include representatives from management and labor, and might also include members from the local community, including:

- Human Resources
- Employee Assistance Program (EAP)
- Union
- Safety
- Health/Medical
- Security/Law Enforcement

While many departments may be represented on the planning group, only a few of them will generally be involved in actually responding to reported incidents. For example, representatives from Human Resources, EAP, and Security often make up an incident response team. Typically, representatives from the other departments will not be involved in responding directly to
incidents, but they will act as consultants to the incident response team or play an active role only in certain types of situations.

Staff expertise: Every company will have different areas of staff expertise. Your company may have employees who have special skills that could be put to good use in a potentially violent situation, such as employees who are skilled in mediation, conflict resolution, crisis counseling, investigations, or threat assessment. Identifying departments and individuals ahead of time, working with them in the planning stages, and agreeing on a coordinated response effort is one of the most effective ways of preparing your company to handle potentially violent situations should they arise.

**Working with Your Union**

If your company has a union, it should involve the union early on in the process of planning workplace violence programs. Unions are the elected representatives of bargaining unit employees and are legally entitled to negotiate over many conditions of employment of those employees. Although some of the substantive issues relating to workplace violence, including issues concerning internal security may be outside the duty to bargain, this does not mean that consultation and discussion with the union cannot occur.

Union involvement is particularly appropriate where there are labor-management partnership councils. It is a good practice to involve recognized unions up-front, before decisions are made, so that they can have an opportunity both to express employees' concerns and to bring to bear their expertise and knowledge. Union involvement demonstrates both the company's and union's commitment to the success of a workplace violence program.

Various case studies have been included in this course to help a planning group determine if they are adequately staffed, trained, and able to respond to incidents.

**Defining violence in the workplace**

The nature and extent of your organization’s workplace violence program should be based on the results of the initial risk assessment.

First, evaluate past incidents of violence or possible violence (they may not have been classified as “violence”). For example you may not have considered the threatening phone call from an estranged spouse to an employee a “violent incident,” but it was.

It can be helpful when identifying risks in your organization to know that violence is usually classified into three categories, each type requiring different interventions.
Type I - Criminal Act

This type of violence involves verbal threats, threatening behavior, or physical assaults by an assailant who has no legitimate business relationship to the workplace. The person enters the workplace to commit a robbery or other criminal act. Violence by strangers accounts for most of the fatalities related to workplace violence. Workplaces at risk of violence by strangers commonly include late night retail establishments and taxi cabs. Road rage is becoming more common as a possible source of Type I violence affecting workers who drive as a part of their job.

Type II - Recipient of Service

The person causing violence is either recipient or object of a service provided by workplace. He/she is a current or former client, passenger, or customer.

Type II violence involves verbal threats, threatening behavior or physical assaults by an assailant who either receives services from or is under the custodial supervision of the affected workplace or the victim. Assailants can be current or former customers and clients such as passengers, patients, students, inmates, criminal suspects or prisoners. The workers typically provide direct services to the public, for example, municipal bus or railway drivers, health care and social service providers, teachers and sales personnel. Law enforcement personnel are also at risk of assault from individuals over whom they exert custodial supervision. Violence by customers or clients may occur on a daily basis in certain industries; they represent the majority of non-fatal injuries related to workplace violence.

Type III - Employment Relationship

The person has an employment-related involvement with the workplace:

- Job related — a current or former employee who is angry about a situation.

Job related violence involves verbal threats, threatening behavior or physical assaults by an assailant such as a current or former employee, supervisor or manager. Any workplace can be at risk of violence by a co-worker. In committing a threat or assault, the individual may be seeking revenge for what is perceived as unfair treatment.

- Non-Job related - a person who has a relationship with a current or former employee.

Domestic violence erupting at work is one of the most common types of workplace violence and involves verbal threats, threatening behavior or physical assaults by an assailant who, in the workplace, confronts an individual with whom he or she has or had a personal relationship
outside of work. Personal relations include a current or former spouse, lover, relative, friend or acquaintance. The assailant's actions are motivated by perceived difficulties in the relationship or by psychosocial factors that are specific to the assailant.

**Type IV Personal Relationship**

A person who has a relationship with a current or former employee such as an abusive spouse or domestic partner, relative, friend or acquaintance.

Domestic violence erupting at work is one of the most common types of workplace violence and involves verbal threats, threatening behavior or physical assaults by an assailant who, in the workplace, confronts an individual with whom he or she has or had a personal relationship outside of work. The assailant's actions are motivated by perceived difficulties in the relationship or by psychosocial factors that are specific to the assailant.

**Determining risk factors for workplace violence**

The types of violence identified in the previous section illustrate different characteristics of workplace violence and the ways violence may present itself. The significance of these types is that each involves somewhat different risk factors and means of preventing or responding to the potential violent incident.

A risk factor is a condition or circumstance that may increase the likelihood of violence occurring in a particular setting. For instance, handling money in a retail service makes that workplace a more likely target for robbery, the most common kind of violence by strangers in the workplace. An attorney's office, where all payments are received by check and money is not directly handled, would not present the same kind of target and would not be at the same degree of risk of violence due to the handling of money.

Each risk factor only represents a potential for an increased likelihood of violence. No risk factor, or combination of risk factors, guarantees that violence will occur or that its incidence will increase. However, the presence of the risk factors listed below, particularly of several in combination, increases the likelihood that violence will occur.

- Do employees have Contact with the public?
- Does an exchange of money occur? *
- Is there selling/dispensing alcohol or drugs?
- What is the nature of delivery of passengers, goods or services?
• Is the workplace mobile? (such as a taxicab or police cruiser)

• Is there exposure to unstable or volatile persons? (such as in health care, social services or criminal justice settings)

• Do any employees work alone or in small numbers? *

• Do employees work late at night or during early morning hours? *

• Do employees work in high-crime areas? *

• Do employees guard valuable property or possessions? *

• Do employees work in community settings? *

• Are your employees deciding on benefits, or in some other way controlling a person’s future, well-being, or freedom? (such as a government agency)

* Identified by NIOSH as risk factor for homicide (CDC/NIOSH Alert, 1993)

**Conducting a security survey**

It's important, as part of the initial assessment, to conduct an initial security survey to determine whether modifications need to be made in the physical aspects of your business. Again, this is highly dependent upon the location and type of business. Precautions that may be suitable for some workplaces include:

It's important, as part of the initial assessment, to conduct an initial security survey to determine whether modifications need to be made in the physical aspects of your business. Again, this is highly dependent upon the location and type of business. Two considerations would be physical access and jurisdiction.

**Access**

Precautions regarding physical access include:

• Limiting the access, as appropriate, to the workplace by former employees or clients.

• Developing policies regarding visitor access within facilities. For example, if warranted, require visitors to sign in and out at reception, wear an identification badge while on the business premises, and/or be escorted.
Jurisdiction

Work out in advance all jurisdictional issues among the various security and law enforcement entities that may be involved should an emergency occur. There have been cases where an employee has called 911 and critical moments were lost because in-house law enforcement were the ones with jurisdiction, rather than the local police. In other cases, employees called their in-house security guards and time was lost while local police were being contacted because the security guards did not carry firearms.
Module 1 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. **Successful company violence prevention programs usually start by forming a**
   _______.
   a. Security detail
   b. Safety committee
   c. Emergency response team
   d. Planning group

2. **Companies should involve unions early on in the process of planning workplace violence programs.**
   a. True
   b. False

3. **This type of violence involves verbal threats, threatening behavior or physical assaults by an assailant who has no legitimate business relationship to the workplace.**
   a. Type I
   b. Type II
   c. Type III
   d. Type IV

4. **In this type of violence, the individual may be seeking revenge for what is perceived as unfair treatment by management.**
   a. Type I
   b. Type II
   c. Type III
   d. Type IV
5. Studies indicate that all the below increase the probability of violence in the workplace, except _____.
   
a. Exchange of money  
b. Work in a union shop  
c. Contact with the public  
d. Selling/dispensing alcohol or drugs
Module 2: Developing an Effective Written Policy

Write a comprehensive policy statement

A policy is a predetermined guide established to provide direction in decision making. It reflects top management goals and objectives related to a given business function within the company. An effective policy is both educational and directive. It informs everyone about expected behaviors and standards and why they are important. It also assigns responsibility to perform certain duties or oversee people and programs.

Advantages of Written Policies

Once a workplace violence program is ready to be implemented, companies must decide whether to issue a written policy statement.

Company programs can also be implemented without a written policy statement. In these companies, employees are often given information about the program (especially whom to call) in training sessions, on posters, in newsletter articles, or by other similar methods. Note: Companies have an inherent right to take action against employees who engage in disruptive or threatening behavior whether or not they have issued a written policy statement.

Policy Statement Contents

A workplace violence policy statement should convey that:

- All employees are responsible for maintaining a safe and healthful work environment;
- The policy covers not only acts of physical violence, but harassment, intimidation, and other disruptive behavior;
- The policy covers incidents involving all interactions between:
  - supervisor and employee
  - employee to employee
  - employee to supervisor
  - employee to non-employee
  - non-employee to employee;
• The company will respond appropriately to all reported incidents;

• The company will act to stop inappropriate behavior; and

• Supervisors and all the departments involved in responding to incidents will be supported by company management in their efforts to deal with violent and potentially violent situations.

**Recommended Approaches**

Consider the following recommendations in developing your written policy statement:

*Keep it brief:* A written policy statement should be brief and simple. Implementation details can be provided in training and in more detailed backup documents. For example, roles and responsibilities of the various departments involved in responding to potentially dangerous situations can be outlined in memoranda of understanding or in operating manuals/instructions rather than in the written policy statement that is issued to all company employees. This approach gives company staff the flexibility they will need to deal creatively with these fluid, unpredictable situations.

*Consider the disadvantages of using definitions:* There are disadvantages to using definitions of terms such as violence, threats, and harassment in your written policy statement. Definitions can discourage employees from reporting incidents that they do not believe fall within the definition. The reporting system should not deter employees from reporting situations that frighten them. An employee knows a threat, intimidation, or other disruptive behavior when he or she experiences it --- definitions are not necessary. If you want to clarify the scope of your organization's concept of one or more of the terms in the policy, you could use examples. For example, you may want to give examples of verbal and non-verbal intimidating behavior.

Another consideration is that definitions are often restrictive and may create legal problems in the future when you are taking disciplinary actions against the perpetrators of workplace violence. Use of definitions can make it more difficult to defend a case on appeal.

*Be cautious with "Zero Tolerance:"* Consider that there could be negative consequences from using the term zero tolerance. It could create legal problems in the future when you are taking disciplinary actions against the perpetrators of workplace violence. Use of the term could make it more difficult to defend a case on appeal because a third party could conclude, however mistakenly and inappropriately, that the company has not considered a penalty appropriate for the particular offense.
There are other possible consequences. The term, "zero tolerance" might appear to eliminate any flexibility a company has in dealing with difficult situations even if this is not intended. Another undesirable side effect is that the appearance of inflexibility can discourage employees from reporting incidents because they do not want to get their coworker fired -- they just want the behavior stopped. This appearance of inflexibility also may discourage early intervention in potentially violent situations.

The sample policy below contains language that is similar to "zero tolerance," but takes care of the previously mentioned concerns. It says the company will not tolerate violent or disruptive behavior and then clarifies what that means by saying "that is, all reports of incidents will be taken seriously and dealt with appropriately."

Consult with Legal Counsel: Be sure to consult the company legal department or attorney for the legal implications of your draft policy.

Lorrie M., a former student writes, "Zero tolerance is a term I have used multiple times w/ construction workers and unsafe behavior. I must admit I have used it to confront hostile work environments...I shall think twice before using it loosely!"

**Model Policy for Workplace Threats and Violence**

Nothing is more important to (Company Name) than the safety and security of its employees. Threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals by anyone on (Company Name) property will not be tolerated. Violations of this policy will lead to disciplinary action which may include dismissal.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on (Company Name) property will be removed from the premises as quickly as safety permits and shall remain off (Company Name) premises pending the outcome of an investigation. (Company Name) will initiate a decisive and appropriate response. This response may include, but is not limited to; suspension and/or termination of any business relationship, reassignment of job duties, suspension or termination of employment, and/or criminal prosecution of the person or persons involved.

In carrying out these (Company Name) policies, it is essential that all personnel understand that no existing (Company Name) policy, practice, or procedure should be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing.
All (Company Name) personnel are responsible for notifying the management representative designated below of any threats which they have witnessed, received, or have been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which they regard as threatening or violent, when that behavior is job related or might be carried out on a company-controlled site, or is connected to company employment. Employees are responsible for making this report, regardless of the relationship between the individual who initiated the threat or threatening behavior and the person or persons who were threatened or were the focus of the threatening behavior.

This policy also requires all individuals who apply for or obtain a protective or restraining order which lists company locations as being protected areas, to provide to the designated management representative a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent.

(Company Name) understands the sensitivity of the information requested and has developed confidentiality procedures which recognize and respect the privacy of the reporting employee(s).

The designated management representative is:

Name: _______________________________________________
Title: _____________________________________________
Department: ____________________________
Phone: ________________________________________
Location: ____________________________

You can't always prevent violence because violent incidents are sometimes unpredictable, but you can reduce the risk by planning ahead and being prepared to act swiftly to deal with threats, intimidation, and other disruptive behavior at an early stage.

So there you have it. Not everything you need to know, but it's a start. The only task left is the module quiz, so let's get to it.
Module 2 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. Companies have an inherent right to take action against employees who engage in disruptive or threatening behavior whether or not they have issued a written policy statement.
   
   a. True  
   b. False

2. All of the following are subjects that a workplace violence policy statement should convey, except?
   
   a. The company will respond appropriately to all reported incidents. 
   b. The company will act to stop inappropriate behavior. 
   c. All employees are responsible for their behaviors. 
   d. The policy covers only acts of physical violence.

3. The violence prevention program reporting system should deter employees from reporting situations that frighten them.
   
   a. True  
   b. False

4. Definitions of violence are often restrictive and may create legal problems.
   
   a. True  
   b. False
5. All the following are disadvantages of using the term "zero tolerance" in a violence prevention program, except _____.

   a. it could create legal problems in the future
   b. use of the term could make it easier to defend a case on appeal
   c. it might appear to eliminate flexibility in dealing with difficult situations
   d. it may discourage early intervention in potentially violent situations
Module 3: Developing a Written Violence Prevention Plan (VPP)

Introduction

After completing the initial workplace assessment for risk factors and developing a written policy, the next step is to develop a comprehensive written Violence Prevention Plan to carry out the policy. One major component of any workplace violence prevention plan is, of course, prevention. This module will focus on important subjects which should be included in the plan:

- identifying warning signs of violence
- control measures to reduce the probability or prevent violence

An employer may choose to create a separate workplace violence prevention plan or incorporate this information into other company documents. This may include the company's accident prevention plan or an employee handbook.

Workplace Violence Warning Signs

One of the common types of workplace violence is that among co-workers. In addition, a high percentage of violent incidents are perpetrated by individuals from outside the workplace. This includes situations such as domestic violence, bomb threats, and violence by customers.

While they are often preventable, it is still difficult to determine whether or not any particular workplace situation is potentially violent. This is an emotional and complex topic, and decisions about what to do in certain situations are not always straightforward or made in a clearheaded state of mind. In many cases, employees ignore warning signs because they believe they are not important, "that's just the way Joe is," or that it is none of their business. In other situations, employees react based on fear and what they believe is the profile of a potentially violent person, not necessarily observed actual behavior. Another major hindrance is not knowing where to go to get help in making determinations regarding real and potential risks.

Actual threats should always be taken seriously and responded to immediately. When there is not an actual threat, judgment and senses should be trusted. The "gut feeling" that one gets when talking to people should be respected. If one feels that someone is dangerous, take the proper precautions.

Forms of Violence Among Co-workers

There are many forms of workplace violence among co-workers. Unfortunately, the one form that receives the most attention is workplace homicide. But there are far more incidents of
violence that do not involve casualties but have the same traumatic effects. Some examples of the most frequently encountered situations among co-workers are:

- concealing or using a weapon;
- physical assault upon oneself or another person;
- actions which damage, destroy, or sabotage property;
- intimidating or frightening others
- harassing, stalking, or showing undue focus on another person;
- physically aggressive acts, such as shaking fists at another person, kicking, pounding on desks, punching a wall, angrily jumping up and down, screaming at others;
- verbal abuse including offensive, profane and vulgar language; and
- threats (direct or indirect), whether made in person or through letters, phone calls, or electronic mail.

**Other Forms of Workplace Violence**

It is important to recognize that violent incidents in the workplace may include acts of domestic violence. Often, co-workers and supervisors believe that domestic violence is something that is not their concern, but a private family matter that should not be brought to work. But the problem does spill over into the workplace. Domestic violence accounted for 27% of violent events in the workplace. If the victim has sought shelter or a restraining order, the workplace is frequently the place s/he can be found. It is not uncommon for the perpetrator to show up at the work site to carry out acts of violence against the partner or anyone trying to protect that person.

Because of the nature of the services provided, there are also incidents of workplace violence perpetrated by clients/customers, particularly in enforcement and investigative settings. Finally, bomb threats make up an increasing percentage of workplace violence incidents. Many threats are made against individuals. Others allege that bombs have been planted in Federal facilities. Most threats are made by telephone.
Levels of Violence and Response

Potential or actual violent situations among employees usually escalate if not defused. Violence and the warning signs that typically occur can usually be identified at three levels. It should be noted that anyone or combination of warning signs at the three levels may be indicative of a potentially violent situation. The following is an attempt to delineate warning signs and the appropriate response. There is no fail-safe way of presenting this information to employees. Employees will have to make a judgment call as to the appropriate action to take by discerning and evaluating the given situation.

Level One (Early Warning Signs)

The person is:

- intimidating/bullying;
- discourteous/disrespectful;
- uncooperative; and/or
- verbally abusive.

Response When Early Warning Signs Occur at Level One

- Observe the behavior in question.
- Report concerns to your supervisor to seek help in assessing/responding to the situation. If the offending employee is your immediate supervisor, notify the next level of supervision. If the offending person is not an employee, your supervisor is still the appropriate individual to notify.
- Document the observed behavior in question.
- Supervisor should Meet with the offending employee to discuss concerns. Follow these procedures:
  - Schedule private time and place.
  - Coordinate any necessary union participation.
  - Get straight to the point.
o Ask the employee for his or her input.

o Ask the employee what should be done about the behavior.

o Ask how you can help.

o Identify the performance and/or conduct problems that are of concern.

o Identify the steps you would like to see to correct problems.

o Set limits on what is acceptable behavior and performance.

o Establish time frames to make changes and subsequent consequences for failing to correct behavior and/or performance.

o Department's policies.

**Level Two (Escalation of the Situation)**

The person:

- argues with customers, vendors, co-workers, and management;
- refuses to obey agency policies and procedures;
- sabotages equipment and steals property for revenge;
- verbalizes wishes to hurt co-workers and/or management;
- sends threatening notes to co-worker(s) and/or management; and/or
- sees self as victimized by management (me against them).

**Response When the Situation Has Escalated to Level Two**

- If warranted, call 911 and other appropriate emergency contacts (such as Federal Protective Service) for that particular facility, particularly if the situation requires immediate medical and/or law enforcement personnel.
• Immediately Contact the supervisor and, if needed, the supervisor will contact other appropriate official(s) such as functional area experts to seek help in assessing/responding to the situation.

• If necessary, Secure your own safety and the safety of others, including contacting people who are in danger (make sure emergency numbers for employees are kept up-to-date and accessible).

• Document the observed behavior in question.

• Supervisor should Meet with the employee to discuss concerns and, if appropriate, begin or continue progressive discipline. The supervisor should follow these procedures:
  o Call for assistance in assessing/responding, if needed.
  o Avoid an audience when dealing with the employee.
  o Remain calm, speaking slowly, softly, and clearly.
  o Ask the employee to sit down; see if s/he is able to follow directions.
  o Ask questions relevant to the employee's complaint such as:
    o What can you do to try to regain control of yourself?
    o What can I do to help you regain control?
    o What do you hope to gain by committing violence?
    o Why do you believe you need to be violent to achieve that?
    o Try to direct the aggressive tendencies into another kind of behavior so that the employee sees s/he has choices about how to react.

**Level Three (Further Escalation - May Result in an Emergency Response)**

The person displays intense anger resulting in:

• suicidal threats;

• physical fights;
• destruction of property;

• display of extreme rage; and/or

• utilization of weapons to harm others.

Response When Situation is a Level Three Emergency

Any individual observing violent or threatening behavior which poses an immediate danger to persons or property is expected to:

• Call 911 and other appropriate emergency contacts (such as Federal Protective Service) for that particular facility, particularly if the situation requires immediate medical and/or law enforcement personnel.

• Remain Calm and Contact supervisor.

• Secure your personal safety first.

• Leave the area if your safety is at risk.

• Cooperate with law enforcement personnel when they have responded to the situation.

Once law enforcement personnel are on the scene, they will assume control of the situation. Witnesses should be prepared to provide a description of the violent or threatening individual, details of what was observed, and the exact location of the incident.

• Document the observed behavior in question.

• Supervisor, where needed, will contact functional area experts and will follow the procedures described in the Level Two section.

Domestic Violence

Except when those involved in domestic violence are co-workers, most incidents are perpetrated by non-employees. It is, therefore, unlikely that the levels of violence described earlier will be evident. There will, however, be early warning signs that this type of violence is escalating outside the workplace. The victim may show symptoms such as increased fear, emotional episodes, and/or signs of physical injury. Victims, as well as perpetrators, also show signs of work performance deterioration. By intervening when the early warning signs occur,
even though violence may not yet have been committed at work, a serious incident may be prevented.

**Response Involving Domestic Violence**

In the event the perpetrator shows up at work with the intent of harming the employee and any others who happen to be in the way or involved, follow the procedures described in Level Three in responding to the immediate crisis.

If it is known that an employee is being affected by domestic violence, whether or not the perpetrator has shown up at work, it is important to provide support and assistance. Not only is the person at risk for more and usually escalated violence, but it has an impact on the safety and productivity of the entire work force. Below are some tips for supervisors when helping an employee affected by domestic violence.

- Talk with the employee about your concern of the possibility of the violence extending into the workplace and Recommend that the employee contact the Employee Assistance Program or the Department's resource and referral service, WorkLife4You (formerly LifeCare), for assistance in dealing with the problem.

- Recommend the employee call the National Domestic Violence Hotline for more information about domestic violence or to help find local resources.

- Contact the Employee Assistance Program for more information and/or assistance, if needed.

- Recommend that a workplace safety plan be developed in case an incident occurs at the workplace. Think about the safety of the individual as well as everyone around her/him. Don’t be a hero if the perpetrator shows up at work. Follow the safety plan and go for help.

**Proactive Control Measures**

The written violence prevention plan should describe proactive methods and means to limit or reduce the potential for workplace violence. The plan should direct regular risk assessments of facilities and address areas where simple improvements can be made that would greatly increase the safety of employees and visitors. Once existing or potential hazards are identified through the hazard assessment, then hazard prevention and control measures can be identified and implemented. These measures may include (in order of general preference):
Engineering Controls

Redesigning, installing, substituting materials, equipment, machinery, workstations, etc. (things we use) in the workplace.

Examples include:

- Install surveillance cameras, silent alarms, metal detectors, or bullet-proof glass.
- Improve lighting in and around the place of work, including parking lots.
- Have reception areas that can be locked to prevent outsiders from going into the offices when no receptionist is on duty.

Administrative/Work Practice Controls

Develop safe/secure processes and procedures (things we do/don't do) in the workplace.

Examples include:

- Establish sign-in procedures for visitors.
- Implement pre-employment screening procedures to reduce the number of personnel prone to exhibiting violent behaviors.
- Develop employee assistance programs.
- Arrange escorts for employees who are concerned about walking to and from the parking lot.

Personal Protective Equipment

Equipment we wear to protect us from harm.

Examples include:

- Provide bullet-proof vests for police and security personnel.

Posting applicable laws, such as those prohibiting assaults and stalking, in visible locations may also serve as a prevention measure.
Prevention Measures

Consider using one or more of the following prevention measures that help design the workplace and develop procedures to reduce risk factors for violence.

Type I (Criminal Violence) Prevention Measures

- training (include de-escalation techniques appropriate to your industry)
- post signs stating cash register only contains minimal cash
- leave a clear, unobstructed view of cash register from street
- have a drop safe, a limited access safe or comparable device
- address adequate outside lighting
- examine and address employee isolation factors
- provide security personnel
- communication method to alert police/security
- increase police patrol in the area
- post laws against assault, stalking, or other violent acts

Potential Type II (Recipient of Service) Prevention Measures

- training (including de-escalation techniques appropriate to your industry)
- examine and address employee isolation factors
- quick communication method to alert security
- eliminate easy access to potential weapons
- client referral/assistance programs
- set up worksite so employees are not trapped from exiting
• provide security personnel
• post laws against assault, stalking, or other violent acts
• employee reporting systems

Potential Type III (Employment Relationship) Prevention Measures

• training (including de-escalation techniques appropriate to your industry)
• enforced "no tolerance" policy for workplace violence
• management strategy for layoffs
• management policy for disciplinary actions
• access to employee assistance program or other counseling services
• enforced policy prohibiting weapons
• provide security personnel
• post laws against assault, stalking or other violent acts
• restraining orders
• control access to worksite
• access to consultation with employer, employee assistance program or other counseling program
• reporting procedures
• relocating within worksite where possible
• necessary staff notification
• provide security personnel
• policy regarding restraining orders
Your assessment should include a regular review and maintenance of appropriate physical security measures, such as electronic access control systems, and video cameras, in a manner consistent with applicable state and federal laws. Don't overreact, not everybody needs metal detectors. However, it is important that all employee receive training in de-escalation techniques for all types of violence. Assess your risk factors for an accurate determination. If no money, drugs, or other high-risk situations are present, detectors and cameras may be excessive.

**Administrative Control Strategies**

Companies need to have programs in place to assist troubled employees and address managerial problems before threats or violence occur. Administrative controls include all the following programs:

- **Pre-Employment Screening**: Use a job application form that includes an appropriate waiver and release (permitting the employer to verify the information reported on the application). Prior to hiring any applicant, check references and inquire about any prior incidents of violence. In addition, conduct thorough background checks and use drug screening to the extent practicable. In developing an employee screening process, remember the Americans with Disabilities Act of 1990 (ADA) and related state statutes prohibit employers from discriminating against qualified individuals with physical or mental disabilities. While federal law and judicial decisions provide that an employer may disqualify an employee who is a danger to self or others, the employer may be obliged to investigate a claim of disability to determine whether dismissal is necessary for the protection of the employee or others in the workplace.

- **Employee Assistance Program**: Consider providing a confidential EAP to address substance abuse, emotional, marital, and financial problems, or provide employees with a list of relevant community resources. Employees, supervisors, and managers should be actively encouraged to use these services. If an employee is going to be facing termination, for whatever reason, transition services such as EAP counseling should be considered.

- **Incident Reporting**: Encourage victims of threats and violence outside the workplace to notify their employers about the incident when warranted so their employers can take appropriate measures to help protect them and their co-workers from possible future incidents of violence at the worksite. Upon notification, employers should provide receptionists and other front-line personnel, having a need to know, a description or
picture of the alleged offender and inform them what actions they should take in the event that the individual seeks entry or contact.

- **Exit Interviews**: Conduct exit interviews when employees retire, quit, or are transferred or terminated, to identify potential violence-related security or management problems.

- **Alternative Dispute Resolution (ADR)**: Some companies use ombudsman programs, facilitation, mediation, and other methods of alternative dispute resolution (ADR) as preventive strategies in their workplace violence programs. ADR approaches often involve a neutral third party who can assist disputing parties resolve disagreements. ADR is most helpful in workplace violence programs at the point when a problem first surfaces, i.e., before an employee’s conduct rises to a level that warrants a disciplinary action. Review additional information on ADR.

**Take a Flexible Team Approach**

It may have become apparent in the case studies in Module 1 that plans for a coordinated response to reported incidents must be kept flexible. Responsibility for overall coordination and direction is usually assigned to one individual or one department. The coordinator must have the flexibility to use the plan as a guideline, not a mandatory set of procedures. More important, the coordinator must have the flexibility to tailor the recommended response to the particular situation. It is important to recognize that threatening situations often require creative responses. Given this, the importance of flexibility cannot be overemphasized.

The case studies highlight the need for backup plans in situations calling for an immediate response where the individual responsible for a certain aspect of the response effort has gone home for the day, is on vacation, or is out of the building at a meeting.

Taking a team approach in responding to a potentially violent situation is an ideal way to provide backup coverage. A flexible team approach ensures that all staff in Employee Relations, the Employee Assistance Program, Security, and other departments are thoroughly trained and prepared to work together with management to deal with potentially violent situations. It ensures coverage, regardless of which staffer in each of the departments is on duty when the incident occurs.

**Take Advantage of Community Resources**

Finally, there are many programs and resources in the community such as police, security experts, and local organizations that can help you develop your workplace violence prevention plan. Some examples follow:
• **Police**: Invite local police into your firm to review the written violence prevention plan. They may also promote good relations and become more familiar with your facility. The police can explain what actions they typically take during incidents involving threats and violence. Such visits can help your firm work better with police when incidents do occur.

• **Security experts**: Use security experts to evaluate your written plan and educate employees on how to prevent violence in the workplace. Such experts can provide crime prevention information, conduct building security inspections, and teach employees how to avoid being a victim.

• **Local organizations**: Consider using local associations and community organizations, such as the Chamber of Commerce, security organizations, and law enforcement groups, as a resource to stay abreast of crime trends and prevention techniques. Communicate to your employees those issues and trends which pose a significant threat.

Developing a written plan that clearly informs and directs is crucial to an effective violence prevention program.
Module 3 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. One of the most common types of workplace violence is that among _____.
   a. workers and customers
   b. domestic partners
   c. co-workers
   d. lower-level staff

2. Unfortunately, the one form of workplace violence that receives the most attention is _____.
   a. property destruction
   b. homicides
   c. physical assault
   d. verbal abuse

3. Installing surveillance cameras, silent alarms, metal detectors, or bullet-proof glass is an example of a(n) _____________.
   a. engineering control
   b. administrative control
   c. personal protective equipment
   d. management control

4. Administrative/work practice controls include all the following, EXCEPT _____.
   a. improved lighting around parking lots
   b. establishing sign-in procedures for visitors
   c. developing employee assistance programs
   d. arranging escorts for employees
5. Consider using one or more of the following prevention measures for Type I (Criminal Violence) EXCEPT ______.

   a. training (include de-escalation techniques)
   b. obtain restraining orders
   c. leave a clear, unobstructed view of cash register from street
   d. post signs stating cash register only contains minimal cash
Module 4: Violence Prevention Program Education and Training

*Note:* The information in this module provides guidance for the company planning group. It is not technical information for professional investigators; nor is it a summary of fact-finding or investigating procedures. Rather, it is intended to provide the company planning group with a general overview of fact-finding/investigating considerations. It is also important to note that this section discusses investigations that are administrative inquiries as distinct from criminal investigations.

**Training Violence Prevention**

Training is a critical component of any prevention strategy. Training is necessary for employees, supervisors, and the staff members of each department that may be involved in responding to an incident of workplace violence. Training and instruction on workplace violence ensures that all staff is aware of potential hazards and how to protect themselves and their co-workers through established prevention and control measures.

*Providing appropriate training informs employees that management will take threats seriously, encourages employees to report incidents, and demonstrates management's commitment to deal with reported incidents.*

**Training strategies and techniques**

While most everyone agrees that there are clear warning signs before most acts of workplace violence, what action should be taken varies. Nevertheless, making information available to your employees about the potential for violence in the workplace, how to recognize the early warning signs of a troubled or potentially violent person, and how to respond to such a person, could save a life.

Not all individuals who are distraught over services (or lack thereof) or their termination of employment, will become violent. The primary type of training that may be beneficial to all employees is that which concentrates on conflict resolution.

Various federal and state laws or judicial decisions may require the employer to establish written policy and procedures dealing with harassment, as well as the training of employees on sexual or racial harassment, intrusion, company policies prohibiting fighting, the use of drugs or alcohol in the workplace, and the like.

Employers may avoid liability for acts of violence in the workplace where it is shown that the employer conducted training for employees on the recognition of warning signs of potentially violent behavior, as well as precautions which may enhance the personal safety of the employee in the workplace and in the field.
Training sessions conducted by the company's Employee Assistance Program, Security, and Human Resources staffs are particularly helpful, enabling employees to get to know experts within the company who can help them when potentially violent situations arise. Employees and supervisors seek assistance at a much earlier stage when they personally know the company officials who can help them.

**Employee training**

All employees should know how to report incidents of violent, intimidating, threatening and other disruptive behavior. All employees should also be provided with phone numbers for quick reference during a crisis or an emergency. In addition, workplace violence prevention training for employees may also include topics such as:

- Explanation of the company's workplace violence policy;
- Encouragement to report incidents;
- Ways of preventing or diffusing volatile situations or aggressive behavior;
- Types of training;
- How to deal with hostile persons;
- Managing anger;
- Techniques and skills to resolve conflicts;
- Stress management, relaxation techniques, or wellness training;
- Security procedures, e.g., the location and operation of safety devices such as alarm systems;
- Personal security measures; and
- Programs operating within the company that can assist employees in resolving conflicts. For example, this could be the Employee Assistance Program, the ombudsman, and mediation.
Supervisory training

Employers will benefit from training on workplace violence as part of general supervisory training, some conduct separate training sessions on workplace violence, and some include it in crisis management training. Whichever approach is taken, supervisory leadership training should cover:

- Ways to encourage employees to report incidents in which they feel threatened for any reason by anyone inside or outside the organization
- Skills in behaving compassionately and supportively towards employees who report incidents
- Skills in taking disciplinary actions
- Basic skills in handling crisis situations
- Basic emergency procedures
- How to ensure that appropriate screening of pre-employment references has been done

Special attention should be paid to supervisory training in management skills. The same approaches that create a healthy, productive workplace can also help prevent potentially violent situations. It is important that supervisory training include basic management skills such as:

- Setting clear standards
- Addressing employee problems promptly
- Probationary periods
- Performance counseling
- Administering disciplinary procedures

These interventions can keep difficult situations from turning into major problems. Supervisors don’t need to be experts on violent behavior; what is needed is a willingness to seek advice from the experts.
Incident response team training

The members of the incident response team need to be competent in their own assigned duties and they need to know when to call for outside resources. Participating in programs and training sessions sponsored by government and professional organizations, reading professional journals and other literature, and networking with others in the profession are all helpful in dealing with workplace violence situations.

Team members also need to understand enough about each other's professions to allow them to work together effectively. Response team training should allow discussion of policies, legal constraints, technical vocabulary, and other considerations that each profession brings to the interdisciplinary group.

Much of the incident response team training can be accomplished by practicing responses to different scenarios of workplace violence. The case studies in this course are intended for this purpose. Practice exercises can help the staff understand each other's responses to various situations so that there is no confusion or misunderstanding during an actual incident. In addition, practice exercises can prepare the staff to conduct the supervisory training suggested above.

The team members also need to consult regularly with other personnel within the organization who may be involved in dealing with potentially violent situations. Those who are consulted on an as needed basis should receive some appropriate training as well.

Sample Training Topics

**Review the program**

**Extent of the Problem**

List statistics relative to your industry here. Use national and statewide information. You can also discuss the crime statistics of the neighborhood the company is in. Some of this information is available in the Overview Section at the beginning of this guidebook.

**Risk Factors**

Discuss the risk factors in your particular industry here. Look in the section titled "Violent Incidents: Case Scenarios, Potential Risk Factors and Potential Prevention Measures" in this guidebook.

**Worksite Analysis**

Discuss the violence history of your company. You can use the number of incidents, the rate and/or the types.
Security Hardware

Have the manager of your unit show you security hardware. (Put a checklist here of equipment you have at your company to prevent violence. This might include panic buttons, video cameras, security lighting, etc.)

Work Practice Controls

Discuss policies and procedures you have implemented to minimize violence in your company. Include any written procedures. Be sure to address your company’s weapons policy and how to summon help in an emergency.

Follow Up Procedures

Report all assaults

Include here a copy of the form your company uses to report violent incidents.

File charges

(Company name) recommends that charges be filed in every case when an employee is assaulted. We will help you to do so including sending witnesses to testify if needed. No reprisals will be taken against any employee who is assaulted or files charges relating to an assault.

Counseling

If a violent incident occurs, all affected staff will be offered counseling through an employee assistance program or other comparable counseling services.

Exercises to Defuse Violent Situations

Read the information in the Five Warning Signs of Escalating Behavior and Personal Conduct to Minimize Violence charts. You can use these charts to develop three effective activities during training: role-playing exercises, scenarios, and hands-on practice.

During the role-play, note the signs of escalating behavior and the techniques used to control it. Afterwards have the group discuss their observations. Address the following questions: What went well? What problems were there? What responses would work better?

Write a scenario about a violent incident for a couple of employees to act out. Use a case scenario in this course or make up one appropriate to your company.

Hands-on Practice

If the violence in your workplace comes from unarmed people such as patients, you may want to train your employees in self-defense and restraining techniques. Have your employees
actually try out the techniques. Remember, in cases with armed perpetrators, such as robberies, it is usually safer to submit to the perpetrator's demands.
Module 4 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. The primary type of training that may be beneficial to all employees is that which concentrates on ________________.
   a. conflict anticipation
   b. conflict resolution
   c. conflict determination
   d. any of the above

2. At a minimum, all employees should be trained in how to ________________.
   a. manage anger
   b. report incidents of violent, intimidating, threatening and other disruptive behavior
   c. the Employee Assistance Program, the ombudsman, and mediation.
   d. stress management, relaxation techniques, wellness training

3. Incident response team training should include ________________ to minimize confusion or misunderstanding during an actual incident.
   a. practice exercises
   b. videos
   c. written tests
   d. group discussion

4. Supervisor training should emphasize encouraging employees to report incidents in which they feel threatened for any reason by anyone inside or outside the organization.
   a. True
   b. False
5. To de-escalate potentially violent situations in your daily interactions with people, all the following would be taught as appropriate strategies, except?

a. Encourage the person to talk and listen patiently
b. Maintain a relaxed yet attentive posture
c. Position yourself at a right angle rather than directly in front of the other person
d. Attempt to bargain with a threatening individual
Module 5: Incident Investigation and Reporting

Develop a procedure for employees to report incidents

The primary consideration in developing a reporting procedure is to make sure that it encourages employees to report all incidents, even minor ones. Some companies use hotlines. Some arrange for a member of a team to take the calls, usually a specialist from Human Resources or Security. Other companies require employees to report incidents to their supervisor (or to any company supervisor), who in turn reports these incidents to Human Resources or Security.

Credibility for any reporting system will be dependent upon whether reports are handled quickly and effectively. Word spreads quickly among employees when a report is made and nothing is done, when a report is handled improperly, or when the allegations are not treated confidentially. Therefore, before a reporting procedure is announced to employees, ensure the staff who will be responding to reported incidents are trained and able to handle any reported incidents.

Incident reports should be reviewed on a periodic basis to provide feedback on the effectiveness of existing intervention strategies and prevention efforts.

Threat Incident Report System

Your company policy may require employees to report all threats or incidents of violence. If you institute such a policy, you must be ready to deal with the situation. The report will be used by the company to assess the safety of the workplace, and to decide upon a plan of action. The following facts should be included in a threat incident report:

- Name of the threat-maker and his/her relationship to the company and to the recipient.
- Name(s) of victims or potential victims.
- When and where the incident occurred.
- What happened immediately prior to the incident?
- The specific language of the threat.
- Any physical conduct that would substantiate an intention to follow through on the threat.
• How the threat-maker appeared (physically and emotionally).

• Names of others who were directly involved and any actions they took. How did the incident end?

• Names of witnesses.

• What happened to the threat-maker after the incident?

• What happened to the other employees directly involved after the incident?

• Names of any supervisory staff involved and how they responded.

• What event(s) triggered the incident?

• Any history leading up to the incident.

• The steps which have been taken to ensure that the threat will not be carried out.

• Suggestions for preventing workplace violence in the future.

Take a look at a sample threat incident report.

**When the violent or threatening incident occurs**

When an incident occurs, bring together all the necessary resources, which may include help from outside the company.

• When a serious threat is made, consult the sources available to you to help evaluate the level of risk posed by the threat-maker.

• When appropriate, obtain fitness-for-duty evaluations of employees exhibiting seriously dysfunctional behaviors at the workplace.

• Maintain an internal tracking system of all threats and incidents of violence.

• When a threat has been made or an incident has occurred, evaluate the situation and, if warranted, notify the potential victims and/or police.

• The employer must respect the privacy rights and confidentiality rights of employees during any investigation.
Investigating incidents of violence

*I can't work here anymore. I'm afraid he may actually kill one of us!*

The supervisor hears the details of the incident that is causing the employee to feel threatened. Now the supervisor has to do something. The incident can't be ignored. It must be reported. Once reported, the members of the incident response team (along with the supervisor) have to look into it.

**Types of Investigations**

When an incident report is received, one of the first important decisions to make is to decide what type of investigation might be required. There are three basic types of investigations in a violence prevention program:

- **Threat assessment investigation** - in response to behaviors that have the potential to become violent in some way.

- **Administrative investigation** - in response to violent behaviors that might result in administrative action.

- **Criminal investigation** - in response to possible criminal behavior.

Your decision on which type of investigation is required will depend on whether the facts as presented indicate possible criminal behavior. Since arriving at a decision generally involves discussion with employee relations specialists and possibly law enforcement personnel, it is imperative to coordinate efforts fully with these departments ahead of time.

**Threat assessment investigations**

Threat assessment investigations differ from administrative or criminal investigations in that the purpose of the threat assessment investigation is to provide guidance on managing the situation in a way that protects the employee.

Many cases involving threatening behavior can be handled expeditiously and effectively by a supervisor with the assistance of one or more members of the company's incident response team. The security or law enforcement representative on the company's team will ordinarily assess risks, often in consultation with the Employee Assistance Program and employee relations staff, and make recommendations for appropriate strategies and security measures to protect employees. However, it may be helpful for the company's planning group to identify experts in threat assessment ahead of time, in case a situation requires more expertise than team members can provide.
Gathering information: It is also a good idea to work out ahead of time who will gather which types of information on an individual who makes a threat. Multiple sources of information need to be consulted to better understand the person's behavior.

In some cases, the company's incident response team can collect current and reliable information (which would include an investigative report) and then consult with a threat assessment professional to develop options for managing the situation. In other cases, the company's incident response team uses a threat assessment professional to conduct the initial investigation, assess the risks, and make recommendations for managing the situation.

**Administrative Investigations**

It is important to use an investigator who conducts the investigation in a fair and objective manner. The investigation should be conducive to developing truthful responses to issues that may surface. It must be conducted with full appreciation for the legal considerations that protect individual privacy. It is imperative the investigation, especially the interview process, create an atmosphere of candor and propriety. Check out more information on techniques for alternative dispute resolution.

**Use a qualified investigator**

If a decision is made to conduct an administrative investigation, it is important to use a qualified and experienced professional workplace violence investigator. The company planning group should train and qualify one or more such investigators before the need for an investigator arises.

**Investigation and Evaluation**

After an incident occurs, a detailed investigation is imperative. All incidents, including near misses, should be investigated as soon as possible. A delay of any kind may cause important evidence to be removed or destroyed either intentionally or unintentionally. The investigation should focus on fact-finding to prevent recurrence and not fault-finding. Employers should maintain comprehensive records of the investigation.

When conducting the investigation:

- Get statements from witnesses,
- Photograph damage/injuries where appropriate.
- Identify contributing causes.
• Recommend corrective action.
• Encourage appropriate follow-up.
• Consider changes in controls, procedures or policy.
• Use a Threat and Assault Log to collect facts on who, what, when, where and how the incident occurred.

Criminal investigations

In a case where a decision is made to conduct an administrative investigation, and there is potential criminal liability, be sure to work closely with your legal department and law enforcement organization. In potentially violent situations, it is often difficult to determine whether the misconduct is a criminal offense. When there is any doubt, check it out.

Ensure that criminal prosecutions are not compromised. Criminal prosecutions must not be compromised by actions taken during administrative investigations. It is necessary to ensure that the administrative investigator, management, and all members of an incident response team understand that actions taken during an administrative investigation may compromise potential criminal prosecutions.

If the company obtains statements from the subject of the investigation in the wrong way, the statements can impede or even destroy the ability to criminally prosecute the case. On the other hand, if handled correctly, statements made in administrative investigations could prove vital in subsequent criminal proceedings.
Module 5 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. All the following were given above as ways to encourage employees to report all incidents, except?
   a. Hotlines
   b. Arrange for incident response team members to take calls
   c. Require employees to report incidents to a supervisor
   d. Report incidents directly to OSHA

2. The threat incident report should contain all the following, except _____.
   a. The specific language of the threat
   b. When and where the incident occurred
   c. Names of others who were directly involved
   d. The attitude of the threat-maker

3. When an incident occurs, bring together all the necessary resources, which may include help from outside the company.
   a. True
   b. False

4. According to the text, investigation categories include all the following, except _____.
   a. Threat assessment investigation
   b. Accident investigation
   c. Administrative investigation
   d. Criminal investigation
5. **Actions taken during the administrative investigation will not compromise potential criminal prosecutions.**

   a. True
   b. False
Module 6: Incident Reporting

Immediately after the violent act

Immediately after an assault occurs, an employer should focus first on providing for the medical and psychological needs of all affected employees. Other immediate steps include:

- Report the incident to the local police department and support law enforcement activities (for example: crime scene investigation and interviewing witnesses, victims, and others).
- Secure work areas where disturbances occurred.
- Account for all employees and others and ensure the physical safety of those remaining in the area as soon as possible.
- Provide for site security and ensure that no work area is left short-staffed while others assist the victim or help in securing the area.
- Quickly assess the work area, if it was disturbed or damaged during an incident, to determine if it is safe.
- Provide critical incident debriefing to victims, witnesses, and other affected employees (these conversations must be strictly confidential).
- Provide accurate communication to outside agencies, media and law enforcement.

Initiate the Post Incident Trauma Plan

The post trauma plan should focus activities first on meeting the immediate medical and psychological needs of employees as necessary. Employees may also need the services of an employee assistance program or other counseling services.

Provisions for follow-up after medical and psychological treatment, medical confidentiality, and protection from discrimination must be addressed in the plan to prevent the victims of workplace violence from suffering further loss. The plan should also address ways to reduce financial losses to the company caused by absence, lost productivity, and workers’ compensation claims.
Immediate debriefings: All affected employees should be included in a debriefing so that the cause of the violence and expectations can be discussed, a plan of action can be addressed, and those needing further counseling can be identified.

**Employee Assistance Program services (EAP)**

Though most employees will need only brief intervention, provision should be made for the few employees who may need longer-term professional assistance. Strategies for identifying these employees and guiding them as smoothly as possible from emergency-centered interventions to more extensive mental health care should be included in the planning.

The EAP may approach these responsibilities in different ways, depending on the size and experience of its staff. In some cases, internal EAP resources may be sufficient, but in others, additional staffing will be necessary. EAP staff members that do not have expertise in traumatic incident counseling may wish to develop in-house expertise or keep close at hand the phone numbers of resources to contact should an incident occur. Potential sources of additional help, for example, private contractors, community mental health resources, university or medical school programs, might be explored.

Since management bears the brunt of responsibility after a violent incident, and can find itself dealing with unfamiliar challenges under high stress, the EAP can be very helpful in facilitating an optimal response. It can provide managers with information on traumatic events and can assist them in analyzing the situation and developing strategies for the organization’s recovery. An effective EAP needs to be familiar not only with post-disaster mental health care, but also with management practices that facilitate recovery and with other resources which may need to be mobilized.

**Support Prosecution of Offenders**

To prevent further incidents from occurring and to show their support of the victims, employers should support prosecution of offenders. Accommodate employees after a violent incident in order for them to make court appearances and work with the prosecution. Cooperate with law enforcement authorities to help identify and prosecute offenders through the use of any and all means at your disposal, such as “Crime Stoppers,” rewards, etc.

**Administrative Actions to Keep an Employee Away from the Worksite**

In situations where a disruption has occurred on the job or where there is a belief that the potential for violence exists, a supervisor may need to keep an employee away from the worksite to ensure the safety of employees while conducting further investigation and deciding on a course of action.
Immediate, short-term actions:

- Place employee on excused absence (commonly known as administrative leave). Placing the employee in a paid, non-duty status is an immediate, temporary solution to the problem of an employee who should be kept away from the worksite. It may also be a good idea to offer the employee the option to work at home while on excused leave if possible.

- Detail employee to another position. This can be an effective way of getting an employee away from the worksite where he or she is causing other employees at the worksite to be disturbed. However, this action will be useful only if there is another position where the employee can work safely and without disrupting other workers.

Longer-term actions:

Supervisors are sometimes faced with a situation where there is insufficient information available to determine if an employee poses a safety risk, has actually committed a crime, or has a medical condition which might make disciplinary action inappropriate.

- **Indefinite suspension:** An indefinite suspension is an adverse action that takes an employee off-duty until the completion of some ongoing inquiry, such as a company investigation into allegations of misconduct. Companies usually propose indefinite suspensions when they will need more than 30 days to await the results of an investigation, await the completion of a criminal proceeding, or make a determination on the employee's medical condition.

- **Indefinite enforced leave:** This action involves making the employee use his or her own sick or annual leave (after the 30-day notice period with pay) pending the outcome of an inquiry.

Disciplinary Actions

Where the supervisor possesses the relevant information regarding violent, harassing, threatening, and other disruptive behavior, the supervisor should determine the appropriate disciplinary action. The selection of an appropriate charge and related corrective action should be discussed with human resources and legal staff where appropriate. Some disciplinary actions are:

- Reprimand, warning, short suspension, and alternative discipline. These lesser disciplinary actions can be used in cases where the misconduct is not serious or
intervention may correct the problem behavior. They are an excellent means of dealing with problem behavior early on.

- Removal, reduction-in grade, and long-term suspension. Be sure to coordinate with legal staff to ensure compliance with local, state, and federal law.

Disabilities as a Defense against Alleged Misconduct

The Equal Employment Opportunity Commission (EEOC) has issued important guidance that specifically addresses potentially violent misconduct by employees with disabilities. Although this guidance deals specifically with psychiatric disabilities, it applies generally to other disabling medical conditions. It advises that an organization may discipline an employee with a disability who has violated a rule (written or unwritten) that is job-related and consistent with business necessity, even if the misconduct is the result of the disability, as long as the company would impose the same discipline on an employee without a disability. The guidance specifically states that nothing in the Rehabilitation Act prevents an employer from maintaining a workplace free of violence or threats of violence.

For a detailed discussion of all these points, see EEOC Enforcement Guidance on the Americans with Disabilities Act and Psychiatric Disabilities, EEOC number 915.002, 3-25-97. The guidance is available on the Internet at http://www.eeoc.gov, or a copy can be obtained by calling the EEOC Publications department at (800)669-3362.

Actions to inform all employees and the public

It is important to conduct a group debriefing after a serious incident of violence for immediate co-workers in how to communicate with the victim/co-worker who is re-entering the job after absence. To alleviate anxiety and reduce misinformation, keep the lines of communication open between labor and management. Assign a person or persons to be responsible for dealing with the media, if necessary.
Module 6 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. Immediately after an assault occurs, an employer should focus first on providing for the _________ and _________ needs of all affected employees.
   a. physical, psychological
   b. emotional, physical
   c. medical, psychological
   d. financial, medical

2. All affected employees should be included in a debriefing for all the following reasons, except ______.
   a. The cause of the violence can be discussed
   b. A plan of action addressed
   c. Coordination with local law enforcement agencies
   d. Those needing further counseling can be identified

3. To show their support of the victims, employers should support prosecution of offenders in all the following ways except ______.
   a. Assist the victim in making court appearances
   b. Assist the victim in working with the prosecution
   c. Allow the victim to join the protected witness program.
   d. Help identify and prosecute offenders

4. In situations where a disruption has occurred on the job, or where there is a belief that the potential for violence exists, a supervisor may need to keep an employee away from the worksite.
   a. True
   b. False
5. According to the text, what is the most important reason to keep the lines of communication open between labor and management?

a. To alleviate anxiety
b. To reduce misinformation
c. To control misinformation
d. a and b above
Module 7: Organizational Recovery

Introduction

Despite the best-laid plans of any organization, violence in the workplace can and does happen. Just as companies develop policies and procedures designed to head off these occurrences, they must be equally prepared to deal with the aftermath of such incidents. Quite often management's focus will be on getting the operational side of the department back in working order.

However, just as important as getting the department back on-line is attending to the impact such incidents can have on department personnel. This module will provide information designed to assist management in helping the organization recover after an incident of workplace violence.

Listed below are several initial steps management can take when an incident of workplace violence occurs.

Ensure a management presence in the workplace

It's important that managers commit ample time with their employees, in the workplace or wherever they may be. Employees need to be reassured of their concern, and they need to be able to ask questions. Senior management should ensure that immediate supervisors are supported in this role, relieved of unnecessary duties, and not pulled away from their subordinates to write lengthy reports or prepare elaborate briefings.

Share information with employees

Employees will have many questions and they need the answers -- often more than once -- if they are to resolve the experience for themselves. Information will develop over time, so information strategies need to be simple and fluid. A notice board at the elevator or a recorded message on a "hotline" number may suffice for the basics. A user-friendly system for individual questions also needs to be established.

Include union leadership

It's always good policy to involve the union in designing the various programs within the safety management system. Union representatives can help in reassuring employees after an incident and in getting information to employees.
 Bring in crisis response professionals

When an incident occurs, involve these emergency mental health consultants as soon as possible. They will generally meet with management first, working down the chain, and then with line employees. Based on what the consultants learn, they will offer services such as; debriefings, defusing, and informal counseling, perhaps in the work area.

Employee Assistance Program

Small firms interested in setting up an employee assistance program can call the Employee Assistance Professional Association's member services office at (703) 522-6272; the association will put your company in touch with one of its 96 local chapters. The association can also provide information on how several small businesses can share services.

Support informal debriefing

The formal debriefing doesn't end the recovery process. Provide opportunities for employees to talk informally with one another when they feel a need to discuss the experience. A comfortable break area and flexibility about break times may be all that is needed.

Support care-giving within work groups

Keep work groups together as much as possible, and try not to isolate employees from their normal support groups at work. Show respect and support for employees' efforts to care for one another.

Handle critical sites with care

Initially, the site of a seriously violent incident will probably be secured as a crime scene. If it is, management needs to be sensitive to a number of issues. It is helpful if employees don't have to come back to work and face painful reminders. But on the other hand, the area should not be so "sanitized" that it gives the appearance that management is pretending nothing happened. If someone has died, that person's work area will be a focus of grieving, and it needs to be respected as such.

Buffer those affected from post-event stresses

Effective coordination with the media and timely dissemination of information can help reduce media pressure on those who are the most vulnerable. Assistance with benefits and other administrative issues can reduce the burden on victims and families.
Help employees face feared places or activities

Returning soon, if only briefly, to a feared site can help prevent lasting effects such as phobic responses. Having a friend or loved one along, or being supported by close work associates, may make the first step much easier.

Remember the healing value of work

Getting back to work can be reassuring, and a sense of having a mission to perform can help the group recover its morale. But the return to work must be managed in a way that conveys appropriate respect for the deceased, the injured, and the traumatized.

The Critical Incident Stress Management Process

Formal crisis intervention processes for victims of critical incidents, such as workplace violence, have been used and recommended by mental health professionals for years. One such process, *Critical Incident Stress Management*, has been pioneered by Dr. Jeffrey Mitchell of the University of Maryland at Baltimore County.

Critical Incident Stress Management (CISM) represents an integrated system of services and procedures whose purpose is to achieve several goals:

- Prevent traumatic stress,
- Mitigate traumatic stress,
- Intervene to assist recovery from traumatic stress,
- Accelerate recovery whenever possible,
- Restore to function, and
- Maintain employee health and welfare.

The CISM team

A CISM team, generally comprised of mental health professionals and trained peer support personnel, provides a variety of services including:

- Defusings,
- Demobilizations after a disaster,
Debriefings,

Informal discussions,

Significant other support services,

Individual consults (one-on-one), and

Follow-up services.

For the purposes of this discussion, the focus will be on two of the more commonly used CISM services: debriefings and defusings.

**Critical Incident Stress Debriefing**

The impact of a critical incident on an individual's life appears to be mitigated, to some degree, by the availability of resources that may intervene at various stages following the incident.

The Critical Incident Stress Debriefing (CISD) is a model designed to yield just such a result. The CISD model assists the victims of critical incidents with their recovery process. The model incorporates seven phases:

1. Introductory Phase
2. Fact Phase
3. Thought Phase
4. Reaction Phase
5. Symptom Phase
6. Teaching Phase
7. Re-entry Phase

Debriefings are group meetings that are designed to give participants an opportunity to discuss their thoughts and feelings about a distressing event in a controlled and rational manner, and to help them understand that they are not alone in their reactions to the incident. It is recommended that a formal debriefing be held within 24 to 72 hours after an incident.
Depending on the number of participants and the severity of the incident, debriefings generally last anywhere from one to three hours.

Given the time recommendations for debriefings and defusings, Critical Incident Stress Management (CISM) providers are reminded that CISM interventions should not interfere with the priorities of criminal investigations. In those cases, where criminal proceedings are likely to result from the critical incident, it is important to coordinate CISM interventions with the appropriate prosecutory authority.

Debriefing teams represent a partnership between mental health professionals and peer support personnel. Mental health professionals serving on a Critical Incident Stress Debriefing team possess at least a master's degree in psychology, social work, psychiatric nursing, psychiatry, or mental health counseling. Peer support personnel are trained and prepared to work with mental health professionals in preventing and mitigating the negative impact of acute stress on their fellow workers. All team members receive training in crisis intervention, stress, post-traumatic stress disorder, and the debriefing process.

The following is a brief description of each phase of the debriefing model:

**Introductory Phase**

During this first phase the leader and team members introduce themselves to the participants. The leader describes how a debriefing works and lists the ground rules for the debriefing. The rules are as follows:

- No one is required to talk but participation is strongly encouraged,
- No notes or recordings of any kind are taken during the debriefing,
- Strict confidentiality is maintained, and
- The debriefing is not intended to be therapy.

It is important to convey to participants that their chances for a successful debriefing increase when participants are made fully aware of what to expect during the process.

**Fact Phase**

The fact phase begins with the team leader asking participants to identify themselves and briefly mention their degree of involvement with the incident. For example, participants may relate their role in the incident, how they were informed of the incident, where they were when they received this news, and so forth. Participants may begin relating their first reactions
to the incident. This type of information lays the groundwork for the remaining phases of the process.

**Thought Phase**

Participants are asked what their first thoughts were concerning the incident. The thought phase begins to personalize the experience for the participants. This is the first phase in which some participants may exhibit some reluctance to share.

**Reaction Phase**

Participants are asked to discuss "what was the worst part of the event for them, personally." This phase generally causes participants to begin exploring some of their deeper, personal responses to the event. Depending on the intensity of the event and the number of participants, this segment may last thirty minutes to one hour.

**Symptom Phase**

Participants are asked to describe the signs and symptoms of any distress they experienced, such as feeling nauseated, sweating palms, or having difficulty making decisions. Usually three occurrences of signs and symptoms are discussed:

1. Those that appeared at the time of the incident,
2. Those that arose during the next few days, and
3. Those that they are still experiencing at the time of the debriefing.

**Teaching Phase**

During the teaching phase, the leader and team members share information regarding the relationship between the critical incident and the subsequent cognitive, emotional, behavioral, and physiological reactions that others involved in such events have experienced. Participants should be provided with additional written information to read at a later time. During this phase, participants may ask new questions or bring up information that was not discussed earlier.

**Re-entry Phase**

This phase signals the end of the debriefing. Participants are encouraged to ask questions and explore other issues associated with the incident that may have not surfaced earlier. Team members are asked to provide some summary remarks, and the team leader makes a few additional statements in an effort to bring closure to the debriefing. A crucial message
emanating from the debriefing is that the participants' reactions are normal responses to an abnormal event.

**Is a Debriefing Warranted?**

The decision about whether or not a formal debriefing may be necessary. Though not all-inclusive, some examples of important questions to explore when assessing the need for a debriefing are these:

- What is the nature of the incident?
- Is the event of sufficient magnitude as to cause significant emotional distress among those involved?
- How many individuals are affected by the incident?
- What signs and symptoms of distress are being displayed by the witnesses to the incident?
- Are the signs and symptoms growing worse as time passes?
- Are any of the following key indicators of a need for a debriefing present: behavior change; regression; continued symptoms; intensifying symptoms, new symptoms arising, or group symptoms present?

In some instances, as these and other questions are explored, it may be determined that a formal debriefing is not warranted. Or, perhaps there may be a decision to briefly meet with the group(s) who have been affected by the incidents to further assess the need for a formal debriefing. Under these circumstances, a critical incident stress defusing may be appropriate. This process will be discussed next.

**Critical Incident Stress Defusing**

Other than the critical incident stress debriefing, the defusing is one of the most frequently used Critical Incident Stress Management (CISM) techniques. Defusings are short debriefings. Defusings generally last less than one hour and provide CISM team members with an immediate opportunity to ask a wide range of questions about the critical incident. As in the debriefing, participants are not required to talk during the defusing. It is recommended that defusings be conducted within the first eight hours of the resolution of a traumatic event.
Three phases

The critical incident stress defusing consists of three phases.

*Phase One - Introduction:*

Here the CISM team members introduce themselves, describe the defusing process, set forth the guidelines, and encourage participation.

*Phase Two – Exploration:*

In this phase, team members ask the participants to describe their experience of the critical incident. During this time, the group is permitted to talk freely while the team members monitor the participants' comments. As the group discusses their experiences, the team members can also ask appropriate questions in an effort to learn more about the most important parts of the critical incident. As the discussion begins to fall off; the discussion moves to the third and final phase.

*Phase Three – Information:*

During this phase, team members provide participants with information designed to help them cope during the next few days until the distress resolves on its own or until the team can organize a formal debriefing, if one is deemed necessary. This information consists of suggestions regarding rest, diet, and exercise as well as other stress control strategies.

Outcomes

The critical incident stress defusing will generally result in one of two outcomes. First, it may eliminate the need for a formal debriefing. Participants receive valuable coping information during defusing that, if attended to, can go a long way in mitigating the impact of the critical incident and in accelerating their recovery. In addition, participants come away from a defusing with more information about the incident than they started with and, again, this has proven to be beneficial to the recovery process.

The second possible outcome of a defusing can be to enhance a subsequent formal debriefing. Participants who have attended a defusing will generally have a good idea of what to expect in a debriefing and, hopefully, will have realized the benefit of participating in such a group process. In addition, the team that conducts the defusing will often be part of the larger team that conducts the debriefing. Thus, this Critical Incident Stress Management (CISM) team will have more information about the incident and the involved parties prior to the debriefing. The team will also have a better understanding of the impact of the event on many of the participants.
Conclusion

As mentioned earlier, both critical incident stress debriefing and defusing are among the two most utilized processes under the CISM umbrella. Neither model should be employed by anyone other than trained mental health professionals and other trained CISM team personnel. It should also be emphasized that the CISM process is but one crisis intervention model among others available to companies. In the final module, we'll be discussing how to evaluate your violence prevention program. But, as you know by now, it's time for review!
Module 7 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. Attending to the impact of violent incidents on department personnel is just as important as the effort to get the department back on-line.
   a. True
   b. False

2. Critical Incident Stress Management (CISM) represents an integrated system of services and procedures whose purpose is to achieve all the following, except _____.
   a. Prevent traumatic stress
   b. Accelerate recovery whenever possible
   c. Intervene to assist in determining liability
   d. Mitigate traumatic stress

3. A CISM team, generally comprised of mental health professionals and trained peer support personnel, provides all the following, except _____.
   a. Follow-up compliance inspections
   b. Debriefings
   c. Significant other support services
   d. Demobilizations after a disaster

4. Which of the following is not one of the seven CISD model phases?
   a. Introductory Phase
   b. Feeling Phase
   c. Reaction Phase
   d. Teaching Phase
5. It is recommended that defusings be conducted within the first ______ hours of the resolution of a traumatic event.

   a. 4
   b. 24
   c. 8
   d. 12
Module 8: Program Evaluation

Introduction

One essential element that cannot be overlooked is to evaluate the violence prevention program on a scheduled basis, and immediately after an incident has occurred. If the program is not evaluated at least annually, program issues or weaknesses may never be detected.

As with any program, personnel, facilities, and issues can change within a year and updates must be maintained. Procedures may break down if they are not exercised regularly. In these instances, practice may be necessary to keep procedures effective.

After an incident, it's important to evaluate the program to see if there are any changes that should be made immediately to prevent a similar incident from occurring in the future.

Steps in the Evaluation Process

• Appoint knowledgeable employees to conduct the evaluation to ensure effective results.

• Conduct an initial assessment to determine what program components are in place.

• Analyze the components of the violence prevention program.

• Measure improvement based on lowering the frequency and severity of workplace violence.

• Identify those components that require improvement.

• Conduct and review the results of an employee survey.

• Develop ways to improve ineffective components.

• Educate, train and implement changes in the program.

• Devise and update your system for measuring improvement.

• Keep abreast of new strategies to deal with violence.

Assessment and analysis

The initial assessment is important to make sure all critical components of the violence prevention program are present. Once program components have been assessed, it’s important
to analyze each of the components to determine what they look like. Most components will actually be some sort of procedure or process.

In the analysis, these procedures and processes are broken down into distinct steps. Each step is then looked at to make sure it is necessary and effective. The analysis process involves breaking down each component of the program.

**Important processes and procedures to analyze**

- Post incident response procedures.
- Supervisor/employee walk-around inspection procedures. Do they assess for violence prevention measures?
- Review the employee survey process. Is it producing valid, reliable data?
- Review staff meetings/safety committee meetings to determine if they address violence prevention issues.
- Review workplace violence reporting procedures.
- Track the process of reporting problems and making engineering and administrative control measures.
- Review the violence prevention program education and training process.

It's also a good idea to include local law enforcement representatives, legal staff, OSHA, insurer, or private consultants and/or other expert third-party experts to evaluate program processes and procedures.

**Important policies, plans, reports and records to analyze**

- Review the written violence prevention plan
- Violence prevention program policies. Policies should be informative and directive.
- Log of injuries and illnesses (OSHA 300 Log) to identify trends in workplace violence-related injuries relative to "baseline" rates
- Safety inspection reports
- Medical reports of worker injuries
• incidents of assault and threats of violence
• post incident response reports
• information on high-risk clients with a history of past violence
• minutes of safety meetings
• job hazard analyses
• records of relevant training conducted, attendees and qualification of trainers

**Evaluate the program after an incident**

After an incident occurs, it is especially important to evaluate the workplace violence prevention program and assess its effectiveness. Deficiencies should be identified and corrective action taken. It's crucial to know what risks existed prior to a threat or incident so that the evaluation team can determine what additional security measures, if any, should be put in place after a threat or violent incident.

• If warranted, provide increased worksite protection when serious threats of violence have been made, such as requesting additional police patrols, hiring security guards, and/or alerting organizations or people who might be affected.

• Consider the costs and benefits of providing increased protection to threatened employees, such as changing their phone numbers, relocation, loaning them a cellular phone, or providing them with a quick response distress button or information about where this device can be obtained.

• Counsel potential victims about various civil and criminal options available to them, such as obtaining a restraining order.

**When all is said and done**

Unfortunately, it does not appear that violence is decreasing in our society. Ultimately, this violence is being played out in the workplace. For legal, and more importantly, human reasons, businesses can no longer choose to ignore this important issue. These guidelines were created to help you in planning how your organization can address this issue. OSHA’s violence prevention guidelines are an essential component to workplace safety and health programs.
OSHA recognizes the importance of effective safety and health program management in providing safe and healthful workplaces. OSHA believes that the performance oriented approach of the guidelines provides employers with flexibility in their efforts to maintain safe and healthful working conditions. OSHA has additional information to help you with this and many other safety and health issues.
Module 8 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

1. According to the text, one essential element that cannot be overlooked is to review your program on a ________ basis, at a minimum.
   a. quarterly
   b. yearly, annual
   c. periodic
   d. random

2. Which of the processes and procedures below are important to analyze in the violence prevention program review?
   a. Post incident response procedures
   b. Walk-around inspection procedures
   c. Violence reporting procedures
   d. All the above.

3. Violence prevention program policies should be both informative and directive.
   a. True
   b. False

4. All the following are listed in the text as valuable participants in the evaluation process, except ______.
   a. local law enforcement representatives
   b. OSHA consultants
   c. Department of Human Resources
   d. Insurer representatives
5. According to the text, it appears that workplace violence is decreasing in our society.
   
a. True
b. False