

**SUBJECT:   WORKPLACE VIOLENCE PREVENTION AND RESPONSE POLICY**

Policy Statement: The City of Madison is committed to a safe work environment and to the safety and security of its employees through violence prevention and response efforts. City managers and supervisors will work in conjunction with the Threat Assessment Team (TAT) to the extent reasonably possible to ensure that employees are free from intimidating, threatening, or violent behavior. The City will not tolerate any on or off-duty intimidating, threatening or violent behavior directed towards any City site or any City employee by: any employee; any customer participating in a City service or program; any vendor while engaged in City business; or any person who has a personal relationship with a City employee if the intimidating, threatening or violent behavior of that person interferes, in any way, with the business interests and values of the City, or wellbeing of its employees. Intimidating, threatening, or violent behavior will be assessed and addressed in accordance with this APM and the TAT Manual. To address harassment and discrimination that does not also fall under this policy, please see APM 3-5 for more information.

Scope of Policy: City of Madison employees found to have engaged in intimidating, threatening or violent behavior while on duty will be subject to discipline, up to and including discharge for the first offense. Vendors or participants in City programs found to have engaged in intimidating, threatening or violent behavior may have their contracts canceled or eligibility for funding or loans revoked or called or be barred from further participation in City services or programs. City of Madison employees engaging in intimidating, threatening or violent behavior while off duty will be subject to discipline, up to and including discharge for the first offense, if the intimidating, threatening or violent behavior while off duty creates a connection to the workplace and/or which includes a connection to employees working at the workplace.

Definitions:

Workplace Violence: Any act committed by or against an employee that creates a hostile work environment and negatively affects an individual or group either physically or psychologically. This may include threats, verbal or physical attacks, property damage, coercion, and/or stalking. The TAT manual contains a more extensive definition and examples of Workplace Violence.

Violence and Threats: “Intimidating, threatening or violent” whether on or off duty:

- Behavior as words or actions that cause a person to avoid social contact or to do or refrain from doing an act, by inducing fear.
- Behavior as words or actions that directly, or indirectly, show an apparent intent to cause physical or emotional harm to another person.
- Behavior as words or actions that a reasonable person would believe creates a danger to a person’s safety or property or to the property of the City.

Role of Threat Assessment Team: When making changes to the TAT, care and consideration will be given to the gender and racial diversity of the team, and where possible the team will work to incorporate voices of diverse genders, race, and ethnicity. Where appropriate, the following positional leads will designate alternate participants to ensure diversity of the team. The Workplace Violence TAT shall be comprised of the Human Resources Director, Deputy City

Attorney, EAP Manager, Employee and Labor Relations Manager, Risk Manager and Safety Coordinator, Emergency Management Coordinator, Mayoral Deputy, a Department of Civil Rights Manager, a member of the Madison Police Department with subject matter expertise, and other subject matter experts as designated by the TAT. The TAT's responsibilities include, but are not limited to:

- Offering trainings on operational and procedural best practice approaches to preventing and addressing threats and violence for both TAT members and overall City staff
- Evaluating potential for violence
- Requiring assessments for fitness for duty of certain individuals named as respondents on reports of violence
- Establishing a plan of protection of City employees and taking necessary steps to ensure the safety and security of those that may be targeted
- Coordinating with affected individuals and Departments/Divisions involved
- Collaborating with relevant Departments/Divisions including EAP, MPD, MFD, HR, etc.
- Making referrals to appropriate services including counseling

Reporting: It is the responsibility of City employees to report incidents of intimidating, threatening or violent behavior to their supervisors, their department or division head, the Human Resources staff, City EAP staff or the City Attorney. It is the responsibility of City managers to share this information with TAT through our online or phone reporting options, to investigate such reports, and to take appropriate action according to this policy. There will be no retaliation against an employee who makes a good faith report of such behavior.

- Reporting through Threat Assessment Team Members
  - If a TAT member becomes aware of a situation constituting immediate or imminent threat, MPD will be contacted utilizing 911. These cases will be handled through pre-established emergency response protocols with follow up and monitoring by the TAT and where appropriate, police investigative resources.
  - If the TAT member, after consultation with Madison Police designee or a subject matter expert, establishes that no immediate response or action is needed because the person does not pose an imminent threat of harm or violence to self or others, or the situation does not constitute an emergency, the TAT member will collect information on the case and provide the preliminary information to the Director of Human Resources or their designee. The Director then will add the case to the agenda for the regular monthly meeting for review and assessment.
  - Once the Director receives the information about the case, the Director may decide that further contact with the appropriate departmental manager or director is necessary.
  - If at any time during the review and evaluation period, the Director of Human Resources or any member of the TAT believes the person appears to pose an immediate threat of harm to self or others, and/or creates a situation that constitutes an emergency, the matter will be addressed as described in the above section relating to immediate and imminent threats.
- Virtual Reporting

The TAT has established an online reporting form, located on the Human Resources intranet page. This form allows for threatening, intimidating, violent behavior to be reported. Given delays associated with on-line reporting, City employees are encouraged to only use the on-line reporting system for non-emergency situations or to ask general questions.

- **Contacting Department Managers, Supervisors, or Division Heads**  
It is expected that the primary means for reporting potential threats will be through Department Managers, Supervisors, or Division Heads as they generally hold increased accessibility to City employees who may display or witness threatening, intimidating, or violent behavior. Department Managers, Supervisors, and Division Heads are responsible for notifying a TAT member, investigating any such reports thoroughly where appropriate, and taking appropriate action. The City is responsible for ensuring Department Managers, Supervisors, or Division Heads are trained on reporting cases to the TAT for further investigation.
- **Other Reports**  
Reports may be communicated to City EAP staff, City Attorney, and/or the Human Resources Department. These entities will convey this information to the TAT for further assessment and intervention.

Workplace Violence Prevention and Response Plan: The City's workplace violence prevention contains several main components utilized throughout the lifecycle of workplace violence:

1. Prevention incorporates workplace planning, incident and individual assessments, security, training, and pre-employment screening. The Human Resources Department is responsible for:
  - a. Develop and conduct employee and supervisor trainings. Training topics may include:
    - Definition of workplace violence
    - Explanation of the City's policy on workplace violence
    - Warning signs of potential workplace violence
    - Levels of threat and the appropriate response
    - Management's responsibility and liability regarding workplace violence
    - Reporting and follow up process
    - Process for responding when an incident actually occurs
    - TAT role, processes, and response
  - b. The Human Resources Department is responsible for including a review of the workplace violence policy as part of new employee orientation. The Human Resources Department also identifies further workplace violence training needs based on input from City departments and the Workplace Violence TAT.
  - c. Conduct pre-employment screening and background checks with regards to workplace violence:
    - Interviews: Hiring authorities, with assistance from the Human Resources Department, may include interview questions which measure how candidates might respond to conflict situations. Refer to "A Manager's Guide to Interviews and Background Checks" provided by Human Resources for additional information.
    - Background Checks: After interviews are conducted, background checks may be run on selected candidates, depending on the nature of the position being filled. The Human Resources Department will review convictions to determine those that are substantially related to the circumstances of a particular job and will screen in accordance with federal, state and local law. This is done by checking official court records and other available sources.
2. **Role of EAP**  
The Employee Assistance Program (EAP), including its Critical Incident Response Program, will operate in compliance with APM's 2-12 and 2-15 respectively. When

information about intimidating, threatening or violent behavior, as defined in this Workplace Violence Policy is known to the EAP, the EAP will take action in an attempt to prevent harm. This may include the release of information necessary to prevent harm including obtaining a violence assessment through the Threat Assessment Team or notifying a potential victim. The EAP may also assist employees and families with recovery, should violence occur.

The EAP's role includes the following: policy and procedure development; participation in prevention focused training; ongoing participation on the Threat Assessment Team to offer expertise on Human Behavior and Mental Health related topics; critical incident stress management services (e.g., on scene, pre-incident education, defusing, debriefings); consultation or problem solving, information, referrals, and support to any employee, family member, and/or management who has sought the EAP's services.

3. Enforcement of Workplace Rules

The possibilities of workplace violence problems are increased where there are inadequate and/or inconsistently enforced work rules. The City's Expectations and Rules of Conduct are in Administrative Procedure Memorandum (APM 2-33). The City's rules regarding weapons in the workplace are in APM 2-46. All City employees are expected to adhere to the Rules of Conduct outlined in APM 2-33 and the Prohibition of Weapons outlined in APM 2-46.

4. Any City agency can request a security assessment. The security assessment is conducted by a member of the Madison Police Department's crime prevention staff or as assigned by the Threat Assessment Team Director. It may include:

- A threat assessment specific to that office or agency.
- A review of existing basic security measures, procedures and policies make.
- Recommendations for physical changes or policy and procedure changes.

Where a security assessment determines weaknesses, agencies will develop plans for physical improvements or procedures.

5. Post Incident

The first priority of the TAT is to determine whether further contact with police or emergency medical services is needed for resources and assistance. This contact may be initiated by anyone outside of the TAT who feels it is necessary given the nature of the incident. However, the TAT would abide by evidence-based and best practice approaches to determine the appropriate and necessary steps toward ensuring safety and security of City employees. Once a workplace violence incident occurs, agency managers have a number of responsibilities in addition to reporting the event to the Threat Assessment Team. Depending on the complexity and/or severity of the incident, the agency manager is encouraged to consult with the TAT Director for the purpose of obtaining assistance with one or more of the following responsibilities.

a. Continued Incident Management

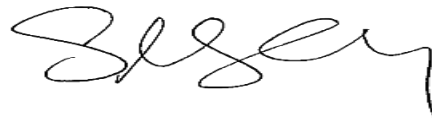
- Emergency Management: A post-incident medical examination may be needed even if emergency medical personnel are not called.
- Investigation: Management is responsible for conducting a timely internal gathering of information that needs to be shared with the Threat Assessment Team for further investigation. When applicable, this investigation shall be collaborative with law enforcement and may occur after the law enforcement investigation is completed.

b. Critical Incident Response: Where necessary, management may determine the need for critical incident response in accordance with APM 2-15. Management is encouraged to consult with the TAT regarding appropriate intervention and support to be offered to the impacted members of unit.

- c. Disciplinary Action: Where necessary, agency management will implement appropriate disciplinary action up to and including discharge. Management is encouraged to consult with the TAT regarding appropriate disciplinary action that may be required.
- d. Post-Incident Review: Following the incident and post incident response, the agency manager will meet with the TAT Director as well as other City officials appropriate (i.e., Human Resources Director) to review the incident and identify what might have been done to prevent it and/or how incident handling could have been improved.

Authority:

This APM will be interpreted and maintained and updated by the Human Resources Director in conjunction with the Threat Assessment Team.



Satya Rhodes-Conway  
Mayor

APM 2-25  
December 21, 2023

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(Revised 3/11/2008, 12/19/2014)