



United States Department of the Interior

OFFICE OF THE SECRETARY
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PERSONNEL BULLETIN NO: 11-12

SUBJECT: Understanding and Responding to Workplace Violence

1. Purpose. This Personnel Bulletin (PB) sets forth the policy and procedures of the Department of the Interior (DOI) on workplace violence.

2. Reference. This PB has been developed consistent with *Dealing with Workplace Violence: A Guide for Agency Planners* (U.S. Office of Personnel Management and the Interagency Working Group on Violence in the Workplace, 1998) and with reference to *Violence in the Workplace: Risk Factors and Prevention Strategies* (National Institute for Occupational Safety and Health, 1996). Additional references include: Title 5, Code of Federal Regulations, Part 2635, Standards of Ethical Conduct for Employees of the Executive Branch; Title 5, Code of Federal Regulations, Part 752, Adverse Actions; and Department of the Interior Departmental Manual, 370 DM 752 Discipline and Adverse Actions.

3. Policy. It is the DOI's policy to promote a safe environment for its employees. DOI employees deserve to be treated with respect, dignity, and fairness. DOI is committed to working with its employees to maintain a work environment free from violence, threats of violence, harassment, intimidation, disruptive types of conflict, or other frightening behavior. In addition, DOI will strive to minimize the likelihood of violence in the workplace through early intervention. Violent outbursts, intimidation, threats, harassment, bullying, or other forms of abusive, aggressive or disruptive behavior will not be tolerated. All reports of incidents will be taken seriously and will be dealt with appropriately. Employees found in violation of this policy will be subject to disciplinary action, up to and including termination of employment, and referral to appropriate law enforcement authorities. Furthermore, individuals who commit such acts may be removed from the premises and may be subject to disciplinary action, criminal penalties, or both.

4. Definition. Workplace violence is any physical assault, threatening behavior or verbal abuse occurring in the work setting. It includes but is not limited to threats (including threats to self); obscene phone calls; an intimidating presence; frightening behavior; harassment of any nature; oral or written statements; gestures, expressions that indicate a direct or indirect threat of physical harm; slapping; grabbing; pushing; or other forms of disruptive conflict or behavior.

5. Responsibility. Bureau/office heads must ensure implementation of policies and procedures to prevent and respond to workplace violence at all work sites. This includes the availability of effective Employee Assistance Programs and the Department's CORE PLUS conflict management and dispute resolution program. Using the Office of Personnel Management's, *"Dealing with Workplace Violence: A Guide for Agency Planners,"* and other resources (see Attachment B), bureau/office officials should develop a process to identify, report, monitor, and respond to specific areas with high potential for workplace violence. It is essential that managers, supervisors, and employees are made aware of these policies and procedures; their shared

responsibilities for preventing, reporting, and responding to threats or acts of violence in the workplace; and the need to report all threats or acts of violence to management officials. In case of emergency, report directly to local security or law enforcement officials.

6. Obligation to Report Incidents of Workplace Violence. DOI employees are encouraged to report immediately all instances of violent, threatening, harassing, intimidating, or frightening behavior, or other forms of disruptive behavior. Do not ignore violent, threatening, harassing, intimidating, or other disruptive behavior. If an employee observes or experiences such behavior by anyone on agency premises, whether or not they are an agency employee, the behavior should be reported immediately to any supervisor or to the bureau/office Human Resources office (HRO). If the incident is reported to a supervisor, the supervisor will contact their HRO. If there is a threat or assault requiring immediate attention, security or law enforcement should be immediately contacted.

7. Establishment of Threat/Risk Assessment Team. Determining the seriousness of a potentially violent or stressful situation and how to best intervene is the basis of a threat/risk assessment. Since it is impossible to know with any certainty whether a threat is going to be carried out, bureau/office heads should always treat threats in a serious manner and act as though the person may carry out the threat. When necessary, a Threat/Risk Assessment Team should be established.

The purpose of the Threat/Risk Assessment Team is to provide guidance on managing the situation in a way that protects the employees. Members of a Threat/Risk Assessment Team will vary, but typically include representatives from: management, HR/Employee Relations, Employee Assistance Program, Security, and Office of the Solicitor.

Threat/Risk Assessment Teams evaluate the risks that the person(s) under suspicion may pose to particular targets. The approach and the timing for these evaluations will be specific to the circumstances of the potentially violent situation. Threats from sources outside the agency may require additional actions and/or coordination with local law enforcement agencies.

Once a threat assessment is completed, Security, in coordination with HR and management, should decide whether additional measures are needed to close any security gaps. Where appropriate and not a security breach, management should explain to employees and customers the course of action being taken and why, to alleviate misunderstandings and confusion.

8. Prevention – Avoiding Workplace Violence. The best prevention strategy is to maintain an environment which minimizes negative feelings such as isolation, resentment and hostility among employees as well as provides for the safety and security of all employees. Although no workplace can be perceived as perfect by every employee, there are several steps that management can take to help create a professional, healthy, and caring climate. These include: promoting sincere, open communication among management and employees; offering opportunities for advancement and professional development; fostering family activities and social opportunities open to all staff members; maintaining mechanisms for complaints and concerns and allowing them to be expressed in a non-judgmental forum that includes feedback to

the initiator; taking a sincere interest in "quality of life" issues such as facilities, job satisfaction and recreation opportunities; taking threats seriously and taking appropriate and timely action; and maintaining fair treatment and discipline for all employees exhibiting improper conduct and performance. Management and employees are also encouraged to use the Department's CORE PLUS program to assist with highly charged communications and to de-escalate events and work constructively to resolve conflicts.

An additional essential prevention measure is careful and thorough screening of pre-employment references to avoid hiring potentially dangerous individuals. Prior to hiring an employee, the supervisor/agency should check with its human resources office (HRO) to determine what employment screening techniques (such as interviewing questions, background and reference checks and drug testing) are appropriate for the position under consideration and that are consistent with Federal laws and regulations. Pre-employment screening is a critical and sensitive part of workplace violence prevention and should receive due investigation and care in its implementation.

Maintaining a physically safe work place is part of any good prevention program. DOI bureaus/offices should use a variety of security measures to help ensure safety. Compliance with these measures is critical and is what keeps employees safe. Education is also a critical component of any prevention strategy.

Intervening early in a threatening or potentially violent situation is vital to preventing its escalation. There are many intervention options, and they vary greatly depending upon the situation. Early intervention may diffuse the initial situation and give the supervisor and others involved an opportunity to more thoroughly review options for resolution. Intervention sets the tone for how the situation will be resolved so it must be handled skillfully.

9. Additional Information. Each bureau/office head should ensure that a local workplace violence policy/plan is in place (for further guidance see *Dealing with Workplace Violence: A Guide for Agency Planners*, United States Office of Personnel Management, February 1998, OWR-09, http://www.opm.gov/employment_and_benefits/worklife/OfficialDocuments/handbooksguides/WorkplaceViolence/index.asp). If this link is unavailable, please contact your servicing Human Resources Office. This PB is meant as a guide, to work in coordination with the bureau/office policy/plan. There are regulations that govern workplace violence, as well as a number of other publications that are helpful references. Additional information on preventing and responding to workplace violence can be found in Attachment B (Resources on Workplace Violence).

10. Point-of-Contact. The Departmental point of contact on this policy is the Department of the Interior, Office of Human Resources, Workforce Management Division, 202-219-0811.



Thomas Mulhern
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Attachments

Attachment A. Examples of Less Commonly Recognized Behavior That Fit the Definition of Workplace Violence¹ as discussed in Personnel Bulletin No. 11-12

Threat: An employee talking to co-workers says, "I like the way some employees handle problems with their supervisors--they eliminate them. One of these days I'm going to bring in my gun and take care of my problems."

Threat: A visibly upset employee corners a co-worker in the co-worker's office and says quietly, "You will pay with your life for going over my head to ask about my work." The employee then stares at his co-worker with hands clenched rigidly at his sides before leaving the office and slamming the door behind him.

Veiled Threats: A supervisor calls the Human Resources office to say, "One of my employees said this morning that he knows where my kids go to school. I know that doesn't sound like much, but if you saw the look in his eyes and heard the anger in his voice, you'd know why I need your help in figuring out what to do."

Intimidation: An employee reports to a supervisor, "A co-worker has been intimidating me with 'in your face' behavior. He stood over my desk in a manner I find menacing; he has crowded me out in an elevator; and he makes gestures at me that scare me."

Intimidation: An employee reports to HR that a co-worker has been picking on her for several weeks and she is afraid something serious will happen. She says the co-worker has been making statements such as, "You took credit for my work and you're spreading rumors that I'm no good. If you ever get credit for my work again, it will be the last time you take credit for anybody's work. I'll make sure of that." The employee had first reported the situation to her immediate supervisor, but was told there was no real danger and that she is blowing things out of proportion. The employee continued to worry so she spoke to her union representative who suggested she talk to HR so the matter could be handled by the Risk Assessment Team.

Frightening Behavior: A supervisor reports that one of his employees is making the other employees in his office uncomfortable. The employee does not seem to have engaged in any actionable misconduct. Because of the agency's workplace violence policy, he feels he should at least mention what is going on to HR. The employee was recently divorced and has gone through a rough time the past two years. He has made it clear he is having financial problems that are causing him stress. He is irritable and aggressive in his speech much of the time. He routinely talks about the number of guns he owns, not in the same sentence, but in the same general conversation in which he mentions that someone else is causing all his problems.

Frightening Behavior: Several employees report to their supervisor an unusual situation which had occurred the previous day. An agency employee from another office had been in and out of

¹ All but one of the examples listed came from the Case Studies listed in *Dealing with Workplace Violence: -A Guide for Agency Planners* (U.S. Office of Personnel Management, 1998). The remainder is a fictionalized example of a situation that occasionally occurs in the workplace.

their office throughout the day, remarking to several people that "the Government" had kept her prisoner, inserted microphones in her head to hear what she was thinking, and tampered with her computer to feed her evil thoughts. She also said her doctors diagnosed her as paranoid schizophrenic, but they are wrong. She made inflammatory remarks about co-workers, and made threatening statements such as "Anybody in my old job who got in my way came down with mysterious illnesses."

Disruptive Behavior: An employee reports to his supervisor that some of his co-workers are behaving in a way that is disruptive to him. He also thinks it could lead to further problems in the office. He says his co-workers "tease" each other. They say things to put each other down, hit and push each other for "fun," and participate in a variety of other "playful" activities. It doesn't appear as though all of his involved co-workers find the "horseplay" funny. He has also seen the "teasing" escalate to an exchange of slaps as the teasing became more serious. The employee wonders if this behavior is covered by the workforce violence directive.

Disruptive Behavior: An employee reports that a senior co-worker who was hired at the GS-14 level six months earlier, is in the habit of shouting and making demeaning remarks to other employees in the office. The senior co-worker is skilled in twisting words around and manipulating situations to his advantage. For example, when employees ask him for advice on a topic in his area of expertise, he tells them to use their own common sense. When they finish the assignment, he makes demeaning remarks about them and speaks loudly about how they have done their work the wrong way. At other times, he demands rudely in a loud voice that they drop whatever they are working on and help him with his project. The employee said he tried to talk to the supervisor about the situation, but was told not to make a mountain out of a mole hill.

Attachment B. Resources on Workplace Violence

A. 42 C.F.R. Part 2, Public Health: Confidentiality of Alcohol and Drug Abuse Patient Records.

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=0a7fc425c57ac5fcf558bc045c32a327&rgn=div5&view=text&node=42:1.0.1.1.2&idno=42>

B. Title 5, Code of Federal Regulations, Part 2635, Standards of Ethical Conduct for Employees of the Executive Branch.

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5e21aa012c4b1e706100d7d122246a14&rgn=div5&view=text&node=5:3.0.10.10.9&idno=5>

C. Title 5, Code of Federal Regulations, Part 752, Adverse Actions.

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5e21aa012c4b1e706100d7d122246a14&rgn=div5&view=text&node=5:2.0.1.1.13&idno=5>

D. Department of the Interior Departmental Manual, 370 DM 752 Discipline and Adverse Actions.

http://elips.doi.gov/app_DM/act_getfiles.cfm?relnum=3738

E. Combating Workplace Violence: Guidelines for Employers and Law Enforcement, prepared by the Defense Personnel Security Research Center for the Private Sector Liaison Committee of International Association of Chiefs of Police.

<http://www.theiacp.org/Portals/0/pdfs/Publications/combatingworkplaceviolence.pdf>

F. The USDA Handbook on Workplace Violence Prevention and Response, October 2001, AD-1135.

<http://www.dm.usda.gov/workplace.pdf>

G. Dealing with Workplace Violence: A Guide for Agency Planners, United States Office of Personnel Management, February 1998, OWR-09.

http://www.opm.gov/employment_and_benefits/worklife/OfficialDocuments/handbooksguides/WorkplaceViolence/index.asp

H. Understanding and Responding to Violence in the Workplace, Department of Health and Human Services. March 1997.

<http://www.hhs.gov/ohr/eap/library/eap3vilc.pdf>

I. Workplace Violence Prevention Program, USDA Departmental Regulation 4200-001, May 31, 2000.

<http://www.ocio.usda.gov/directives/doc/DR4200-001.pdf>

J. U. S. Department of Labor, Occupational Safety and Health Administration, Safety and Health Topics -- Workplace Violence.

<http://www.osha.gov/SLTC/workplaceviolence/index.html>

*If any of the above links are unavailable, please contact your servicing Human Resources Office.