

**Administrative Procedures for Policy 1480.2 Administration  
Regarding Workplace Threat Assessment**

Workplace violence is a complex and widespread issue that in recent years has received increased attention from law enforcement, mental health and human resources professionals. Reports of disgruntled employees or former employees returning to their places of employment with a gun and killing co-workers is one form of workplace violence. Another type of workplace violence is related to personal relationships where an individual gains access to a workplace and commits a crime targeting an employee who is a current or former intimate partner.

Workplace violence ranges from offensive or threatening language to homicide. It may include domestic violence, sexual violence, including sexual harassment or sexual assault, dating violence and stalking.

Workplace violence often results in serious injuries that may result in disabilities requiring ongoing care. Workplace violence may also result in life threatening injuries and even death.

The Centers for Disease Control, Occupational Safety and Health Administration and the National Institute for Occupational Safety and Health categorizes workplace violence into four types based on the relationship among victims, perpetrators and work settings.

- Type I incidents involve offenders who have no relationship with either the victims or the workplaces.
- Type II incidents involve offenders who receive services from the school.
- Type III incidents involve current or former employees acting out toward their present or past places of employment.
- Type IV incidents involve domestic disputes between an employee and perpetrator that spill over into the workplace.

**I. Purpose**

- A. To establish a mechanism for reporting, assessment and/or intervention of a student, staff, contractor or visitor who may pose a threat to the safety of any individuals attending or working in our schools.

**II. Definitions**

- A. **Threat** is a concerning communication or behavior that indicates that an individual poses a danger to the safety of school staff or students through acts of violence or other behavior that would cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or

through any other means; and is considered a threat regardless of whether it is observed by or communicated to a third party; and regardless of whether the target of the threat is aware of the threat.

- B. **Aberrant behavior** is a behavior that is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior for an individual involves actions, statements, communications or responses that are unusual for the person or situation; or actions which could lead to violence toward self or others; or are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to): unusual social distancing or isolation of subjects from peers and family members; sullen or depressed behavior from an otherwise friendly and positive person; out of context outbursts of verbal or physical aggression; increased levels of agitation, frustration and anger; confrontational, accusatory or blaming behavior; an unusual interest in or fascination with weapons; and/or fixation on violence as means of addressing grievance.
- C. **Domestic violence** is a pattern of coercive behavior, including acts or threatened acts, that is used by the perpetrator to gain power and control over a current or former spouse, family member, intimate partner, or person with whom the perpetrator shares a child in common. Domestic violence includes, but not limited to, physical or sexual violence, emotional and/or psychological intimidation, verbal abuse, stalking, economic control, harassment, physical intimidation or injury.
- D. **Threat assessment** is a fact-based investigative approach that evaluates whether an individual's behavior poses a risk to their safety or the safety of others. The appraisal of risk in each situation forces an individual's actions, communications, and specific circumstances that might suggest that an individual intends to commit a violent act/or is engaged in planning or preparing for an event.
- E. **A workplace safety plan** is a strategy developed in collaboration with the victim to implement workplace safety options including, but not limited to, handling of court protection orders; procedures for alerting security personnel, temporary or permanent adjustment of work schedules and locations; change in parking places; and requests for escorts to and from the workplace location.
- F. **Disruptive** is the act of causing disorder, interruption, or delaying the continuity of the work or learning environment.
- G. **Intimidating** is an aggressive behavior that causes another to be fearful.
- H. **School property** is any Calvert County Public Schools building and/or grounds, and any CCPS leased or owned vehicles, and vehicles contracted for official school business. This includes any location used for co- or extra-curricular activities, including any field trips.
- I. **Trespass** is a wrongful interference with the possession of property (personal property as well as real property).

### III. Guidelines

- A. A formal process for assessing workplace-related threats of domestic violence shall be established and implemented by the Calvert County Public Schools Department of Human Resources in collaboration with the Department of Student Services.

- B. A Threat Assessment and Management Team shall be established and include the Director of Human Resources or his/her designee, the Community Resource and School Safety Specialist, the Supervisor of School Psychologist or Mental Health Coordinator, the School Principal or his/her designee, security and Law Enforcement. The school board attorney may serve as an advisor to the Threat Assessment and Management Team.
- C. The Department of Human Resources, in collaboration with the Community Resource and School Safety Specialist, shall implement activities to ensure that all employees are aware of policies requiring the reporting of all workplace-related threats of domestic violence, understand the problem-solving purposes of threat assessment, and know how to report threats. Methods of reporting shall include at least one method for anonymous reporting.
- D. The Threat Assessment and Management Team is responsible for assessing all workplace-related threats of domestic violence and determining what steps are necessary to prevent violent acts from being carried out. This team will coordinate resources both within and outside of the school division, as appropriate.

#### **IV. Identifying and Reporting Threats**

- A. Unlike most other types of violence, victims of domestic/intimate partner violence will commonly try to conceal their abuse. However, the Calvert County Public Schools has an overriding responsibility to respond to and take action to prevent violence that threatens school safety.
- B. Employees who have secured any protective or restraining order that lists the workplace as a protected area are required to promptly inform the Department of Human Resources of such orders.
- C. Employees who have not secured protective or restraining orders but have safety concerns regarding domestic/intimate partner violence are strongly encouraged to report their concerns to the Department of Human Resources so that safety measures can be put in place.
- D. All Calvert County Public Schools employees are required to report to the Department of Human Resources any threats of domestic violence that they witness or of which they have knowledge.
- E. Employees can be assured that Calvert County Public Schools will not retaliate against employees making such reports and will support victims of domestic/intimate partner violence by making workplace safety plans, providing referrals to Employee Assistance and other appropriate community resources and permitting time off for addressing the threats of violence.
- F. The Department of Human Resources shall implement activities to ensure that all employees be aware of policies requiring the reporting of all workplace related threats of domestic violence, understand the problem-solving purposes of threat assessment, and know how to report threats.

#### **V. Training**

- A. Training for members of the Threat Assessment Managing Team shall include, but are not limited to:

Administrative #1480.2

Written: 2/28/20

Page 3 of 6

1. Dynamics of domestic/intimate partner violence
  2. Methods of responding to reports of workplace threats arising from abusive relationships
  3. Circumstances requiring reporting to law enforcement
  4. Employer legal obligations to victims of domestic/intimate partner violence and related employee issues
  5. Key elements of a workplace safety plan
- B. Training and awareness activities for co-workers shall include but not limited to:
1. Warning Signs that an employee may be involved in a violent relationship
  2. Circumstances that appear to be tied to an abusive relationship that should be reported to the Threat Assessment and Management Team
  3. Community, EAP and other outside resources that can assist employees in addressing domestic/intimate partner violence including legal, psychological and financial resources

#### **VI. Threat Assessment**

- A. All incidents and acts constituting a violation of law applicable protective order will be reported immediately to law enforcement.
- B. The Threat Assessment and Management Team shall determine whether domestic/intimate partner violence poses a risk to the workplace and determine what steps are necessary to prevent violent acts from being carried out. The assessment of risk should include inquiry about whether:
1. a relationship has recently been broken off. This is important because the most dangerous time in an abusive relationship typically occurs when the abused partner tries to separate from the abuser
  2. the abuser has made threats and, if so, how specific and credible are they
  3. the abused employee has sought or been granted a court order of protection and whether the abuser has violated an order in the past
  4. the abuser has a history of violence or criminal activity
  5. the abuser has access to weapons or recently acquired one
  6. there is a pattern of stalking behavior
  7. the abuser has physically or sexually assaulted the employee

#### **VII. Response to Threats**

- A. The Threat Assessment and Management Team will coordinate resources both within and outside of the school division as appropriate to put in place a workplace safety plan. Security measures that maybe established include, but not limited to:
1. Steps to limit the abuser's access to the workplace
  2. Moving the abused employee's workspace to a more protected, less vulnerable area

3. Providing a parking space close to the building entrance or providing a security escort
4. Removing the employee's name from the office telephone directories, changing his/her workplace email address, or screening his/her calls
5. Referral to appropriate legal, financial, and counseling resources

**VIII. Monitoring Response Effectiveness Documentation**

- A. The Threat Assessment and Management Team shall maintain thorough documentation including all information gathered during incident management and ongoing monitoring, and all security measures taken as well as copies of all restraining, protective, or judicial orders relevant to the specific situation.
- B. The Threat Assessment and Management Team will assess the effectiveness of its actions and, as needed, revise procedures and trainings. Policies, procedures and training needs are to be reviewed annual in advance of the beginning of the school year.

**IX. Building Consistency Between Threat Assessment and Management**

- A. Based on an individualized assessment of the risk or priority of the case, teams will engage case management strategies that are sufficient, fair and reasonable to address the concerns identified. For each general threat level there is a minimal level of response or case management that is appropriate. These are general guidelines to prompt consideration of a starting point or case management strategy. A given case may have a fact pattern that necessitates a deviation from the general guidelines. Ehen that is the case, team will deliberate, reach consensus upon action steps, and document the facts or circumstances that factored into their case management plan.

**X. Reporting Incidents and Restoring Order**

- A. Individuals may not trespass on school property at any time, whether the property is being used for official school business; display dangerous, disruptive, intimidating or threatening behavior on school property; or otherwise prevent the orderly conduct of Calvert County Public Schools' business or activities.
- B. In the event an individual act in ways prohibited by the policy, the following steps will be taken to restore a safe and orderly environment:
  1. When an individual(s) observes behavior prohibited by this policy, he or she shall immediately notify the building administrator or the staff member responsible for securing the building if a building administrator is not present (e.g. on weekends or in the evenings).
  2. The building administrator or staff member responsible for securing the building may verbally intervene, if it is deemed safe to do so, in an attempt to eliminate the disruption.
  3. If increased support is needed to eliminate the disruption, the staff member may request additional assistance, including additional staff, law enforcement and/or emergency services. The safety of students, employees and other individuals in the immediate area shall be the primary consideration when determining the need for additional support.

- C. When order is restored and as soon as practicable after the event, the building administrator or staff member responsible for securing the building will notify the Superintendent's Office.

**XI. Consequences**

- A. Any individual who acts in ways prohibited by this policy and/or does not have lawful business to pursue on school property may be subject to the following:
  - 1. Immediate removal from school property;
  - 2. Appropriate legal charges;
  - 3. Disciplinary action, as appropriate, under policies 1112 Regarding Student Discipline or 1750 Regarding Employee Discipline; and/or
  - 4. Extended denial of access to school property.
- B. Denial of Access to School Property
  - 1. The Superintendent or designee shall have the right to deny individuals access to school property.
  - 2. When the address of the individual is known, written notification will be sent to that address informing the individual of the Superintendent or designee's decision and rationale. If the letter is sent by a designee, a copy will also be sent to the Superintendent.
  - 3. If the address of the individual is not known, reasonable efforts will be made to notify the individual of the Superintendent or designee's decision. These efforts may include phone or in-person contact.