



# Managing the Threats of Workplace Violence



## Introduction

Every year, two million American workers report being victimized by workplace violence.<sup>1</sup> Unfortunately, some businesses may under-report non-fatal workplace violence injuries, creating a misleading picture of violence in the workplace. The discrepancy between reported and unreported workplace violence is expected to worsen when statistics for 2020 and 2021 are produced.

However, compelling evidence suggests that employers who take a proactive stance toward concerning behaviors are more successful in deterring workplace violence. Detecting and interceding “at risk” or intimidating behavior in the initial stages can mitigate or stop the threat before it becomes dangerous or even life-threatening.

Given that workplace violence is not easily predictable, empowerment must begin at the employee level. For example, workplace threats can be internal (coworker, supervisor or customer) and external (family member, stranger). So, while holding the door open for a coworker may be well-intended, it could, in reality, be granting entry to someone who was terminated the day before and has returned for revenge. When you raise an employee’s awareness of unacceptable behaviors, you increase the chance to disrupt the sequence of violence. Creating awareness around these “behaviors of concern” and implementing an action plan to de-escalate potentially violent incidents are essential components of a workplace violence prevention program.

Although this resource is designed to provide general guidance on risk management, it is, in no way, a substitute for expert advice. Please consult experienced professionals for guidance on specific threats and workplace violence issues and how to develop and implement a comprehensive workplace violence prevention program.

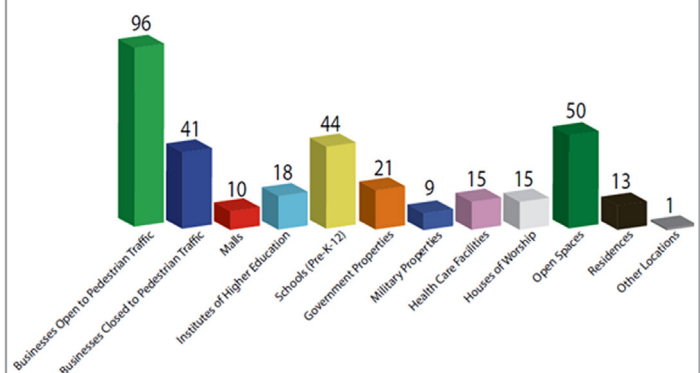
## What Is Workplace Violence?

The American National Standard Institute defines workplace violence as “a spectrum of behaviors, including overt acts of violence, threats, and other conduct that generate a reasonable concern for safety from violence, where a nexus exists between the behavior and the physical safety of employees and others (such as customers, clients, and business associates), on-site or off-site when related to the organization.”<sup>2</sup> However it chooses to manifest itself, workplace violence is a growing concern for employers and employees nationwide.

### Prevalence

Extreme violence, like an active shooter situation, continues to trend upward. Federal Bureau of Investigation (FBI) data from 2020 indicated a 30% increase from 2019.<sup>3</sup> Since 2000, statistics show that 41% of incidents occurred in business environments, while 37% occurred in public locations like schools, healthcare facilities, churches and government offices. Though the location may be unpredictable, over 80% of these events happened *where people work*. Residential homes have also been impacted by extreme violence. According to data collected by the FBI since 2000, just under 4% of mass shootings occurred in residences.

### Active Shooter Incident Locations



Graphic: FBI data on active shooter incidents identified between 2000 and 2019.

### 2020 Statistics:<sup>3,4,5</sup>

- 40 incidents in 19 states
- 164 casualties (excluding the shooters): 38 killed, 126 wounded
- 5 incidents met the “mass killing” definition
- 42 shooters: 35 male, 3 female and 4 unspecified

## Behaviors of Concern

These behaviors include conduct that may function as potential warning signs or precursors to violence and may manifest as behaviors toward themselves, others or an organization:

- Aggression or intimidation
- Bullying and harassment
- Problems with coworkers, family members or other relationships
- Financial hardships
- Known physical violence or harm
- Direct and indirect threats of violence

While mass shootings are highly publicized in the media, they are representative of a small number of workplace violence incidents. Although not all workplace violence results in fatalities, the latest Census of Fatal Occupational Injuries (CFOI), conducted by the Bureau of Labor Statistics, cited 454 workplace homicides in 2019 and 392 workplace homicides in 2020. The CFOI also reported 259 workplace suicides in 2020, which was the lowest count for occupational suicides since 2015. Additionally, over 20,000 private-industry workers experienced some form of nonfatal workplace violence incident.<sup>6</sup>

Working alone or in isolated areas can contribute to the potential for violence. Providing services and care, and working where alcohol is served, may also affect the likelihood of violence. While there is no data to suggest that lone workers are more or less likely to be victims of workplace violence, it's certainly the case that they are more vulnerable, especially during the early morning or late evening.

### Types of Workplace Violence

Workplace violence typically falls into four categories based on the relationship among victims, offenders and work settings.

#### Type I – Criminal Intent

The offender has no relationship to the victim or the organization but enters to commit robbery or another crime.

#### Type II – Customer/Client

The offender has a legitimate relationship with the business. For example, the person receives services from the organization (retail, health or service industry) when they commit an act of violence.

#### Type III – Worker on Worker

Involves current or former employees acting out toward their current or former place of employment.

#### Type IV – Personal Relationship

Involves someone such as an abusive spouse or domestic partner who doesn't work at the location but has a personal relationship with an employee that spills over into the workplace.

### Dispelling Common Myths

In the aftermath of violent events, people are sometimes known to say, "I thought it could never happen here." In reality, violent events are planned, and, in most cases, the violent offender intentionally targets a specific individual. The targeted individual is usually a supervisor, human resources manager or coworker they perceive to be responsible for their plight. Dispelling myths around workplace violence is the first step in establishing a solid foundation to prepare and protect an organization's workforce.

#### Remember:

1. There is little evidence that violence is spontaneous.
2. Critical incidents are rarely, if ever, random.
3. Workplace violence can happen anywhere with little to no relationship to a company's product, service, size, location or history.

### Costs

Beyond questions of legal liability and other tangible financial costs, organizations that lack effective means of detecting, managing and preventing violence will likely face more fundamental costs in disrupted productivity, low employee morale and a public image that potentially communicates a disregard for employee safety.

According to the Department of Justice, workplace violence costs 500,000 employees 1.2 million workdays every year and \$55 million in wages lost annually. This figure does not include costs for reduced productivity, medical treatments, workers' compensation payments, and legal and security expenses, which, although less exact, run into billions of dollars. In fact, NIOSH estimates the annual cost of workplace violence for employers to be closer to \$120 billion.<sup>7, 8, 9</sup>

## Compliance Considerations

Founded in 1955, the American Society for Industrial Security (ASIS) International is a global community of security practitioners. Each has a role in protecting assets – people, property and/or information. Their members represent virtually every industry in the public and private sectors as well as organizations of all sizes.

In 2020, ASIS published the [WPVI AA-2020 Standard](#) on Workplace Violence and Active Assailant – Prevention, Intervention, and Response, which "provides an overview of policies, processes, and protocols that organizations can adopt to help identify, assess, respond to, and mitigate threatening or intimidating behavior and violence affecting the workplace."<sup>2</sup>

### OSHA General Duty Clause

While there is currently no [federal standard specific to workplace violence](#), there is potential for such a standard in the future, and steps have been taken toward this as noted in OSHA's directive, CPL 02-01-058, *Enforcement Procedures and Scheduling for Occupational Exposure to Workplace Violence*. Currently, the OSHA General Duty Clause requires that, in addition to

compliance with hazard-specific standards, all employers provide a work environment “free from recognized hazards that are causing or are likely to cause death or serious physical harm.”<sup>10</sup> Workplace violence is a recognized hazard, and as such, employers have the responsibility to abate the hazard per the OSHA Act of 1970.

### State and Jurisdictional Requirements

Several states require employers to implement workplace violence prevention programs. As the ASIS WPVI Standard outlines in its guidance, common-law principles such as the following must be considered to fully understand an employer’s liability for workplace violence<sup>2</sup>:

- Premises liability is an employer’s duty to keep individuals on the premises safe from injury, including criminal and violent acts. Implementing security measures at worksites based on potential violence specific to that site is recommended.
- Respondeat superior refers to an employer’s vicarious liability for the acts of its employees within the course and scope of

their employment. This liability is typically very fact-specific and often hinges on whether an employer’s actions, or failure to act, contributed to the violence.

- Negligence in hiring or retaining employees occurs when the employer knows or should have known the potential for violence. Conducting background screens upon hiring, and responding immediately and appropriately to threats of violence in the workplace, can reduce this liability.
- Discrimination and harassment claims may arise when workplace violence is motivated by protected characteristics such as race or religion.

### The Joint Commission

The Joint Commission, which oversees the accreditation of hospitals and other healthcare facilities, issued new and revised workplace violence standards that took effect on January 1, 2022.<sup>11</sup> This [Workplace Violence Prevention Standard](#) applies to all Joint Commission-accredited hospitals and critical access hospitals.

## Mitigating Workplace Violence

Workplace violence mitigation requires ongoing attention and senior management commitment to personnel security. Promoting a positive workplace culture and creating and enforcing workplace policies can help bring attention to conditions, situations and behaviors that adversely affect worker morale, performance, and production, and ultimately lead to workplace conflict.

According to the Society for Human Resources Management (SHRM) publication, *Workplace Violence: A growing threat, or growing in awareness?* (2019), survey results indicate that 30% of employees and 19% of HR professionals feel ill-equipped to deal with violence in the workplace.<sup>12</sup> Likewise, one in seven workers reports feeling unsafe at work.

Conducting a needs assessment, or “gap analysis,” will provide your organization a better understanding of its safety and security needs and effectively focus its workplace violence prevention initiatives. A gap analysis is designed to identify, evaluate and prioritize the presence of risks of violence affecting the workplace (whether from internal or external sources) and the organization’s readiness to respond to concerning behaviors, threats and violent incidents.

### Workplace Violence Prevention Policy

One of the first measures employers should take is to create a “No Threats, No Violence”<sup>\*</sup> policy toward workplace violence against or by their employees to a person or property. It should:

- Clearly define unacceptable behavior.
- Regulate or prohibit weapons onsite, on an organization-controlled property, and during work-related activities, to the extent permitted by applicable laws.

- Mandate prompt reporting of any behaviors or circumstances that raise a concern for safety from violence or any potential violations of the policy.
- Provide multiple avenues for reporting.
- Assure employees that reports will be treated with the highest degree of discretion and promptly investigated, with notifications made to appropriate parties.
- Include a commitment to non-retaliation.
- Mandate employees to notify Security or other designated personnel of any protective or restraining order.
- Impose disciplinary action up to and including termination.

### Additional Policy Considerations

#### Active Assailant Preparedness

The increase in active assailant events emphasizes the necessity to better plan for the risk of extreme violence. The newly released version of the ANSI/ASIS Standard reflects this with an annex dedicated to planning for active assailant readiness, response and recovery. Employers must plan for the risk of an active assailant, including developing a response plan, identifying key personnel to implement plans at individual sites, liaising with emergency responders and other planning considerations like crisis communications and incident recovery.

#### Travel

Location is a vital component to a workplace violence prevention program. Many organizations have employees who travel domestically and overseas on business. When those individuals arrive at remote destinations, it becomes their temporary workplace. Therefore, it is important to expand the definition of workplace violence to include potential threats or violence at these sites, even though they are away from the brick-and-mortar company.

<sup>\*</sup>Avoid “zero tolerance” because the term diminishes reporting and decreases safety.



## Conduct and the Threat of Violence

Workplace violence is any sufficiently severe, offensive or intimidating conduct that may cause employees to fear for their safety. It includes words or actions delivered in person or virtually, including by phone, mail, email, text or various forms of social media.

The actual threat of violence is defined by intentional conduct or behavior that causes an individual to fear for their personal safety and the safety of their family, friends, coworkers or property.

## Training and Education – Tiered Approach

Using a unique tiered approach, the Center for Personal Protection and Safety (CPPS) benchmarks prevailing best practices, existing compliance documents and organizational cultures to focus on the five centers of gravity. Tier 1 is the foundational core of an effective workplace violence prevention program for an organization. Tier 2 provides the basic training for all employees, and the subsequent tiers are tailored training components for specific employee population groups. Outlined below are the various tiers and the value that CPPS provides to its customers.

### Tier 1 – Plans, Policies and Procedures

Policies, procedures and training strategies exemplify each company's distinctive values and culture. In like manner, each workplace violence prevention program is benchmarked against comparable clientele (Fortune 100 companies) and recommended measures delineated in the ANSI/ASIS and OSHA Directive are integrated to ensure compliance.

### Tier 2 – All Employees (Awareness Training)

Knowledge of prevention and intervention strategies can help to increase safety in the workplace. This foundational level of training is for all employees/stakeholders and includes topics such as workplace violence awareness, prevention and response, situational awareness, intimate partner violence and stalking, extreme violence response, and terrorism awareness and response. To accommodate the largest training need, awareness training can be delivered through a variety of methods, including media-based and in-person solutions.

### Tier 3 – Managers and Supervisors

Managers and supervisors require a deeper examination of workplace violence. They should strengthen their current understanding with additional training that enables them to better identify "behaviors of concern" that indicate someone might be struggling and potentially on a path toward violence. Topics of discussion include:

- Trending issues and insights regarding the prevention of workplace violence.
- "Behaviors of concern" and de-escalation.
- Safe suspensions, terminations and layoffs.
- Active shooter perspectives and insights.
- Internal and external threat dangers, early warning signs and prevention strategies.

### Tier 4 – Threat Management Team and Crisis Management Team

When a threat is received, time is critical. A coordinated, multi-disciplined team approach can deter a potentially violent incident and maximize the company's ability to provide employee safety. A Threat Management team creates measures to monitor, manage and mitigate the risk of violence.

Threat Management and Crisis Management team members should receive the most detailed and comprehensive training regarding the behavioral and psychological aspects of workplace violence as well as violence risk screening, investigatory and intervention techniques, incident resolution and multi-disciplinary case management strategies. This training often includes lectures, case studies, and practical exercises in assessing and managing threats and threatening behavior.

Due to its nature, Threat Assessment and Threat Management training is commonly provided by outside experts to maintain industry best practices such as the ANSI/ASIS American National Standard and OSHA Directive as well as principles promoted by the Association of Threat Assessment Professionals (ATAP). Following training, professionals are often retained to provide real-time assistance in assessing and managing workplace threats as they occur. With hybrid work environments increasingly becoming the norm, threats and threatening behavior can be more challenging to manage and require increased attention.

### Tier 5 – Executive Team

A specialized training program geared toward select staff provides enhanced understanding of a mock crisis. Training consists of a simulated disaster (such as an active shooter) that is tailored toward the organization. Through the use of a tabletop exercise and group discussion, participants navigate through potential challenges a crisis may expose. Emphasis is placed on the low-stress yet systematic group problem-solving process.

### Common Risk Management Strategies

Consider implementing the following physical risk management steps:

- Require all visitors and vendors to register before entering the worksite. If the site has no central office or security station, the reception desk can coordinate this function. Ensure the employee who registers visitors has ready access to a security “panic” button. In case of an emergency, a phone call may not be possible.
- Determine how emergency information will be communicated to employees (e.g., intercom system). Identify a meeting location according to the nature of the emergency. Determine alternative means of egress and take steps to ensure that employees are not directed into a violent situation.
- Install alarm systems. Consider video surveillance equipment or closed-circuit TV.
- Consider additional physical barriers such as bullet-resistant glass, deep service counters or pass-through windows.
- Consider in-car video surveillance cameras and global positioning systems for employees with mobile offices.
- Ensure clear visibility of service and cash register areas by installing convex mirrors.
- Use bright, adequate lighting.

Employment practices are also critical in risk management strategies. Steps to take include:

- Running background checks pre-employment or as soon as possible after the accepted offer to avoid potential liability for negligent hiring.
- Collecting and documenting receipt of keys/key cards, name badges and access passes when employment ends.
- Training all personnel on workplace violence-focused warning signs, recognition and reporting procedures.

### Responding to Threats

Often, individuals who engage in violent behavior are doing so as the result of a loss, whether real or perceived, in their personal or professional life, which can trigger a crisis for that individual. Moreover, when individuals go into that type of crisis mode, it affects the way they think, how they feel and how they behave. Individuals who become violent often communicate their intentions in advance, so it is important to encourage reporting concerning behaviors and take those reports seriously.

### Preplanning Considerations

No matter how effective company policies and procedures are in detecting, mitigating or preventing incidents, there are no guarantees against workplace violence. Even the most responsive employers face this issue. If a violent incident occurs, it is essential that the response be timely, appropriate to the situation, and conducted with the recognition that employees are traumatized and that the incident’s aftermath has just begun. Prepare your workforce with the following response actions.

### Public Emergency Numbers

Mobilizing emergency responders takes time. Individuals already at the scene will take actions that have the most significant impact on the overall outcome. Emergency responders are one element of a broader response plan, and numbers should be readily available. Equip employees with key contacts, as well as training and resources for action to take in the interim of the first responders’ arrival.

### Immediate Response Imperatives

- Move to a safer location or away from the facility.
- Once safe, report the incident to emergency responders and then to workplace security resources.
- Comply with emergency responders. Avoid aggressive or threatening actions.
- Use technology to monitor unresolved situations. Communicate real-time updates to affected personnel and emergency responders.
- Notify those in all potential danger zones to escape or seek shelter and barricade.
- Provide first aid to the injured when it’s safe to do so.

### Management Response Steps

- Account for all personnel and determine their status/location.
- Close off access to any areas affected by the incident.
- Conduct a damage and impact assessment.
- Develop and implement a comprehensive communication plan.
- Restore and recover business processes.
- Establish a “current circumstances assessment” and steps required to restore the workplace to full productivity.
- Monitor the physical and mental well-being of those affected by the incident.

Reference the [Workplace Violence Supervisor Resource](#) for additional information on response actions for supervisors to take in the event of active threats in the workplace.

### Post-Incident Response

Companies can significantly reduce the risk of long-term physical, emotional and financial fallout resulting from a violent incident in the workplace. Therefore, it is crucial to have a plan in place to include critical incident counseling and employee assistance programs to deal with victimized employees and employees who may be traumatized by witnessing a workplace violence incident.

## Conclusion

Organizations have a responsibility to protect employees and others by taking measures to detect threats of violence, intervene through incident management and mitigate consequences should violence erupt.

## About the Center for Personal Protection & Safety

The Center for Personal Protection & Safety (CPPS) is the leading developer and provider of scalable training and consulting solutions in the U.S. for Workplace Violence Prevention, Active Shooter Response, and International Travel Safety. CPPS was founded in Spokane, WA, by its CEO, Randy Spivey, in 2002. In 2015, the company relocated its headquarters to Reston, VA, and established the Global Training Center. CPPS has worked together with thousands of organizations – large and small – to include over 50% of Fortune 100 corporations, over 1600 colleges and universities, 2000 hospitals and many of the largest non-profit/charitable organizations in the U.S.

CPPS, Inc. collaborated on this white paper to support the Allied Vendor partnership with CNA to raise awareness and offer preventative measures to enhance workplace safety.

### Randy Spivey, CEO/President and Founder of CPPS

Randy Spivey is recognized as a leading expert in the field of preventing and responding to violence in the workplace, campuses, universities, schools, corporations and religious organizations. Since forming CPPS, Randy and his company have trained over 10 million individuals in Best Practices related to Workplace Violence Prevention, Active Shooter Response, Travel Safety and Security, and Kidnap Survival. Prior to forming CPPS, Randy enjoyed tenure as a Department of Defense executive. Randy managed and provided oversight to all Hostage Survival training programs in the Department of Defense from 1997 to 2002 and co-authored multiple hostage-related policy and doctrine documents.

### Additional Resources

- [Emergency Action Planning: Violence in the Workplace](#)
- [CPPS Allied Vendor Sell Sheet](#)
- [CNA & CPPS Allied Vendor Landing Page](#)
- [OSHA Safety & Health Topic: Workplace Violence](#)
- [NIOSH Workplace Safety & Health Topics: Occupational Violence](#)
- [Society for Human Resource Management: Workplace Violence Resource Center](#)

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