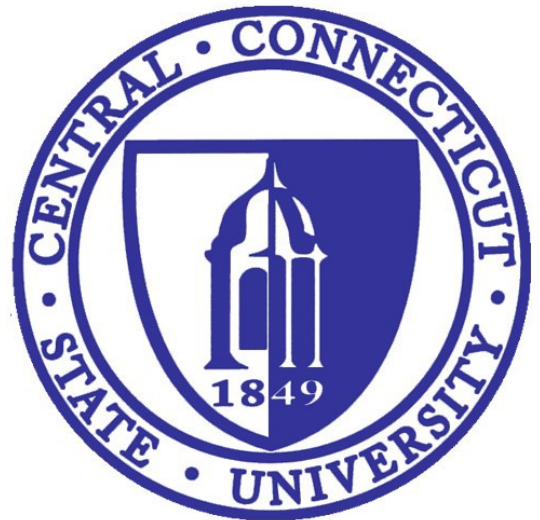


CCSU Violence Free Campus Policy

(Appendix H to Emergency Response Management Plan)



Central Connecticut State University
Dr. Zulma Toro, President

Prepared by Administrative Operations Division

Sal Cintonino, Chief Operations Officer

Chris Cervoni, Interim Chief of Police

Acknowledgement:

With her permission, CCSU has relied extensively on the following publication for the development of this policy:

Designer, Gene; Randazzo, Marisa, et al (2008). *The Handbook for Campus Threat Assessment and Management Teams*. Massachusetts. Applied Risk Management.

PURPOSE

The purpose of this policy is to describe Central Connecticut State University's approach to help ensure the rights of its employees and students to work and learn in a safe and secure environment that is characterized by respect and professionalism.

POLICY STATEMENT

Violence Not Tolerated

Central Connecticut State University (CCSU) strives for a workplace and learning environment devoid of violence. In support of this ideal, CCSU engages in practices that support policies developed by the Connecticut State University System Board of Trustees¹ and the State of Connecticut.²

AUTHORITY and SCOPE

The authority to implement this policy resides in the executive authority granted to the President of the University. In accordance with Board Resolution #98 - 48 this policy applies to anyone on the property of Central Connecticut State University. CCSU extends the reach of the Board policy to include CCSU - sponsored programs or events, as well as anyone enrolled at or employed by CCSU.

INTRODUCTION

The safety and security of the Central Connecticut State University (CCSU) campus and community are vitally important. Our students, employees, and visitors should be able to pursue their education, work and other activities in a safe, non-threatening environment. To educate and empower all members of the University community, resources and procedures are in place to prevent, deter, and respond to concerns regarding acts of violence. Safety is everyone's responsibility.

To help maintain a safe campus, CCSU has taken note of the lessons learned from incidents of violence that have occurred across the nation. Between 1999 and 2003 both the Federal Bureau of Investigation³ and United States Secret Service⁴ produced publications on workplace and school violence that provide insight into the dynamics of violence and offer guidance on the conduct of threat assessment and the management of situations of concern.

¹ Board Resolution #98-48: See Appendix I attached.

² Executive Order #16: See Appendix II attached.

³ *The School Shooter: A Threat Assessment Perspective*, CIRG/NCAVC, (1999); *Workplace Violence: Issues in Response*, CIRG/NCAVC, (2003).

⁴ *Safe School Initiative Report*, United States Secret Service and Department of Education, (2002).

The Secret Service publications in particular, (done in collaboration with the Department of Education) suggest that many violent incidents are preventable, and thus colleges and universities ought to employ several interrelated tactics to form a broad strategic approach to prevention. These approaches include:

- Utilizing school climate and support systems: Cultures and climates of safety, respect, and emotional support can help diminish the possibility of targeted violence in schools. Environments in which students, teachers and administrators pay attention to students' social and emotional needs – as well as their academic needs – will have fewer situations that require formal threat assessments.⁵
- Sharing information and thereby developing the capacity to pick up on and evaluate available or knowable information through “threat assessments” that might indicate a person is on a path toward violence or that there is a risk of violence.
- Employing the results of these risk evaluations or assessments, in developing strategies to prevent violence.
- Recognizing that some acts of violence may not be prevented, ensure the adequacy of traditional law enforcement and emergency response measures.

⁵ Threat Assessment in Schools: page 13.

PRACTICES

I. General

CCSU's approach brings to bear several related support and prevention practices to carry out this policy.

- **Education** – We will continue to educate members of the CCSU community about behaviors that support civility, understanding and mutual respect.
- **Guidance** – We will continue to provide support for academic and administrative departments in dealing with difficult behavioral situations such as:
 - Responding to emotionally troubled or difficult students and employees,
 - Responding to aggressive or potentially violent persons.
- **Assistance** – We will continue to provide assistance to those in crisis through our Counseling and Wellness Center (students) and the Employee Assistance Program (employees).
- **Assessment** – We will continue to gather information about select situations, to assess the need for intervention, and to make recommendations regarding special situations and aberrant behavior.
- **Action** – As the situation warrants, the University will pursue employee disciplinary, student conduct, civil and/or criminal action against any person who violates this policy by engaging in conduct that is disruptive to the institution, violence, threats of violence or intimidation or by bringing weapons on campus or to campus-related programs or events.
- **Best Practices** – Best practices in this arena continue to evolve, therefore, CCSU will continue to identify and consider new information to find the best fit for our institution.

II. Incident Management

A. *Involvement*

The effects of violence impact the entire campus. Apart from any criminal or administrative investigation, the University seeks to involve other key stakeholders in order to have a holistic approach to dealing with such situations.

B. *Crimes or Suspected Crimes*

The CCSU Police will promptly investigate all allegations of criminal incidents of violence. Furthermore, when appropriate, the CCSU Police will apprise Student Affairs and Human Resources of incidents involving students and employees respectively.

C. *Behaviors of Concern*

1. Student Behavioral Review Team (SBRT)

The University has established the Student Behavioral Review Team (SBRT) as an administrative group to share information regarding student behavior that is of concern. The SBRT, through the Vice President for Student Affairs, will work closely with the Threat Assessment Team and will meet at least once a month with the Threat Assessment Team.

2. Human Resources

In the same fashion, the Human Resources Department retains overall responsibility for receiving and acting upon information regarding employee behavioral concerns. The Human Resources Department, through the Chief Human Resources Officer, will work closely with the Threat Assessment Team.

3. Threat Assessment Team (TAT)

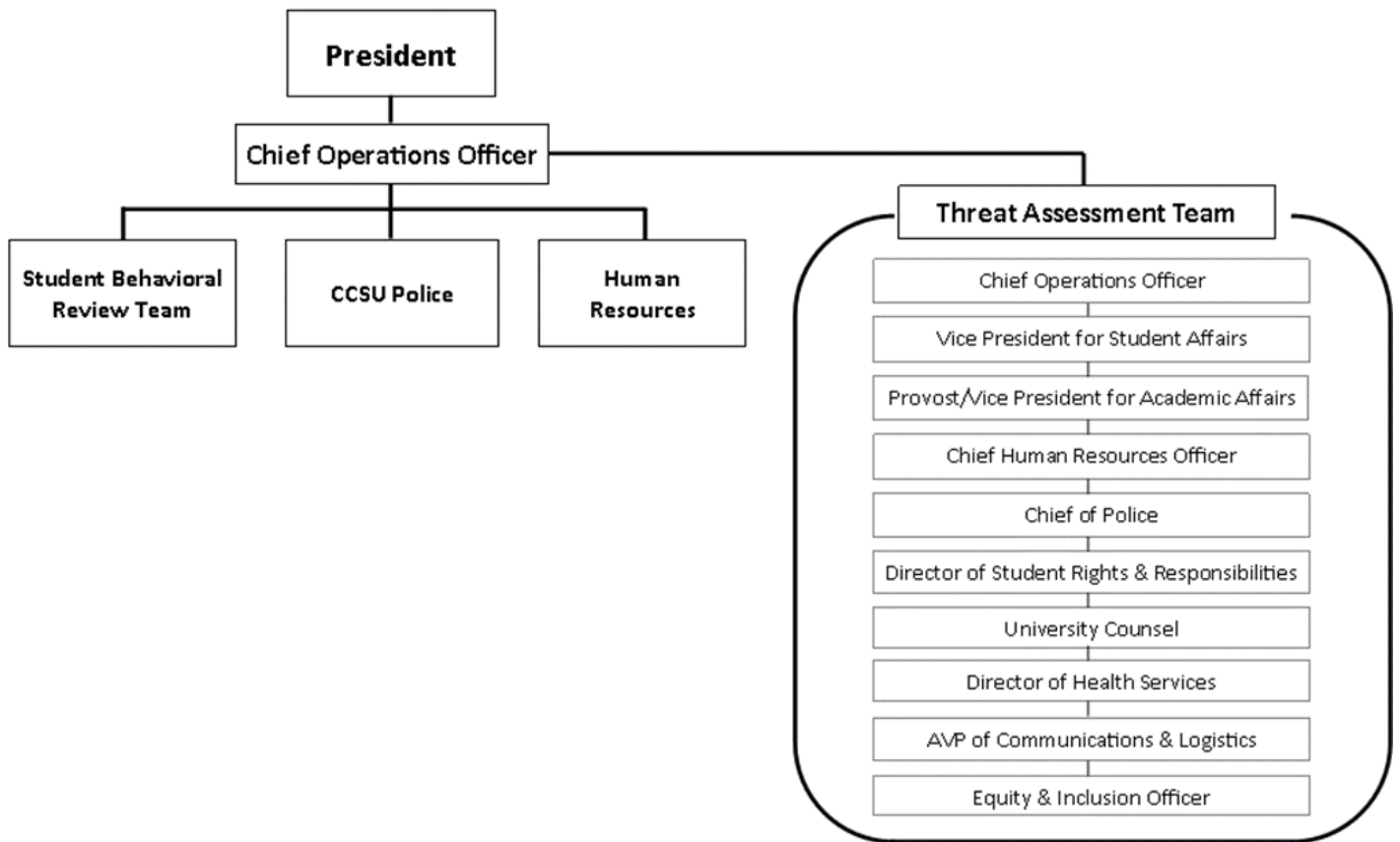
- A. Purpose:** The purpose of the Threat Assessment Team (TAT) is to provide a multidisciplinary structure that reduces or eliminates fragmented care and is focused on prevention and early intervention in situations where students or employees may be experiencing extreme distress, may be engaged in harmful or disruptive behaviors, or where there is the potential for violence. The goals of the Team are:
- To manage each case individually
 - To initiate appropriate interventions
 - To ensure that victims receive appropriate care and/or assistance
 - To be a resource for students, faculty, administrators, and staff
 - To determine appropriate action to assist the departments, faculty, staff and students
 - To conduct an investigation as appropriate
 - To develop and implement an action plan to respond to specific incidents.
- B. Composition:** The TAT is composed of the Chief Operations Officer, Chief of Police, Vice President for Student Affairs, Provost and Vice President for Academic Affairs, University Counsel, Chief Human Resources Officer, Director for Student Rights and Responsibilities, Director for Health Services, Associate Vice President for Communications and Logistics, Equity and Inclusion Officer, and others as needed.
- C. Responsibility:** The Chief Operations Officer is responsible to the President for the overall conduct of the TAT, the assessment and management of incidents and for properly documenting the activities of the TAT.

D. Coordination and Oversight:

- The SBRT and the TAT shall hold a joint meeting at least once a month.
- The SBRT and the TAT shall jointly meet at least once each academic year with the President.
- The Chief Operations Officer shall review this policy annually with the SBRT and the TAT and present recommended changes for the President’s consideration.

E. Training: Members of both the SBRT and the TAT shall be trained in basic threat assessment and management principles and procedures. The Chief Operations Officer shall determine any additional training that may be necessary.

CCSU Violence Free Campus—Threat Assessment Organizational Chart



III. Threat Assessment and Management Process⁶

A. *Decision Thresholds*

No one standard will be applied to assess whether the behavior of concern should trigger action by either the SBRT or the TAT. However, overall effectiveness depends upon the early identification of concerning behavior to "... reduce the likelihood of cases escalating to crisis levels."⁷

B. *Process Description*

Information, whether it comes to the SBRT, Human Resources, or the TAT should be recorded on the Incident Report Form (IRF) and Case Review Form (CRF), both of which may be modified as needed by the Chief Operations Officer. Both forms and a related Quick Reference Guide are available for use by those involved in the assessment and management activities covered by this policy.

For purposes of compliance with BR#9 8-48, these forms constitute the "Threat Incident Report" described in that resolution.

The Threat Assessment Team gathers additional information about persons/situations of concern that are reported to the TAT and fairly and objectively assesses the information gathered to determine whether the person/situation poses a threat of violence to self or others, to CCSU, or otherwise shows a need for intervention or assistance – before planning and implementing any case management or monitoring strategies.

C. *Professional Assistance*

Where appropriate, the TAT may request assistance from professionals with additional threat assessment experience.

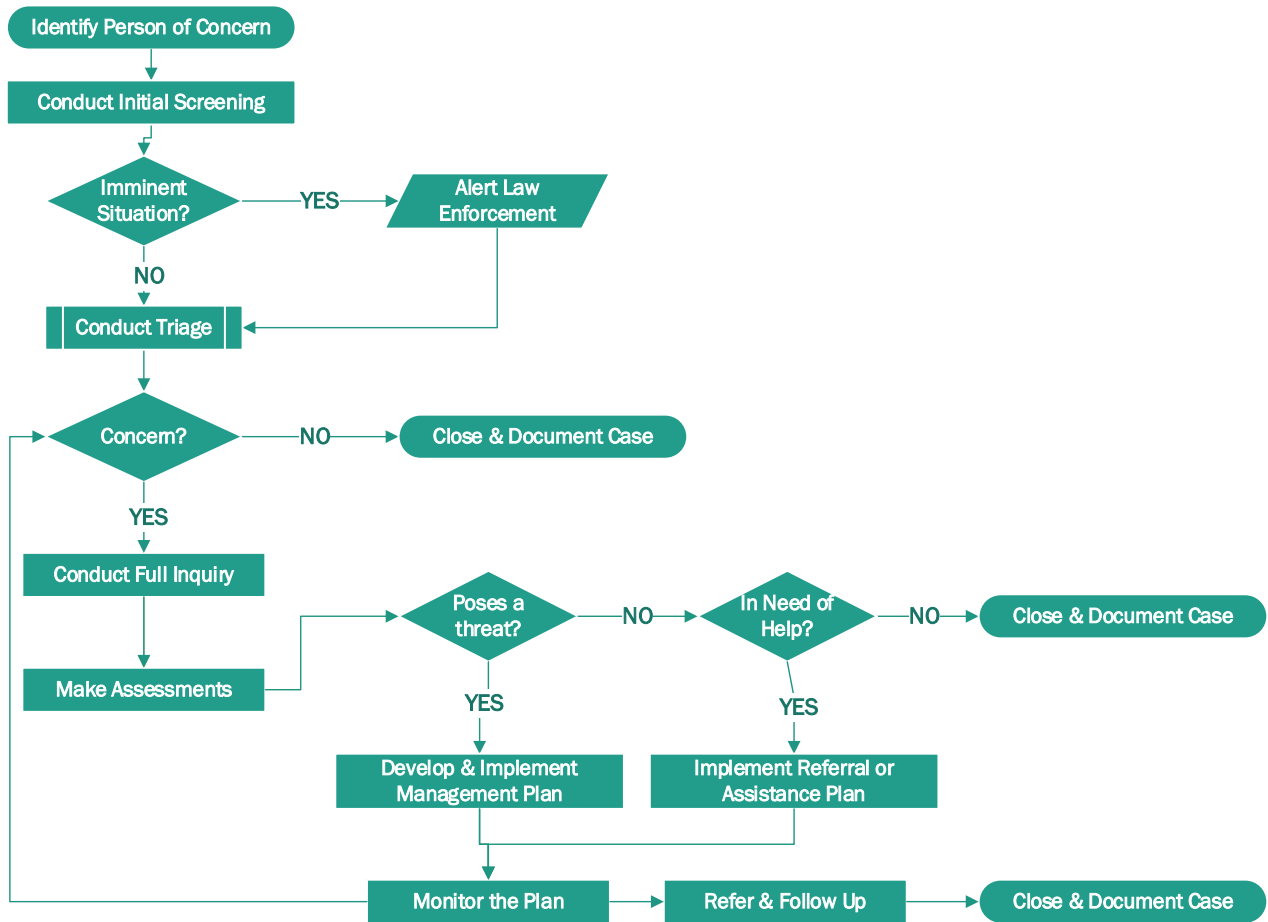
D. *Confidentiality*

It is the intent of this policy that the TAT shall observe the relevant policies and state and federal laws pertaining to privacy and confidentiality including but not limited to FERPA, HIPAA, and State laws governing the privacy of medical records. To this end, completed forms and associated records (except police records) will be maintained by the Vice President for Student Affairs or the Chief Human Resources Officer, depending upon whether the subject of the assessment is a student or employee.

⁶ Based upon: *The Handbook for Campus Threat Assessment and Management Teams*. (Referred to as the "Handbook") Massachusetts, Applied Risk Management. Gene Deisinger, and Marisa Randazzo, Marisa, et al (2008).

⁷ *Handbook*, page 116

Threat Assessment Flow Chart⁸



⁸ Handbook, page 78

E. Case Management

Threat management cases generally remain open until the person in question is no longer reasonably assessed to pose a threat.⁹

The administrator responsible for managing the incident shall assign case work accordingly and ensure that follow up is completed before closing the case.

F. Feedback

While not necessary in every case – particularly those where a full inquiry is not warranted – it may be advisable to provide the referral source and victim (if any) with appropriate feedback on the case. This should be documented with the case.

Similarly, to help identify those aspects of the process that are working well and those that may need improvement, the Chief Operations Officer may seek feedback from victims.

IV. Notification of Emergencies to CCSU President, CSCU President and to the Governor's Office

Notifications shall be made in accordance with the University Emergency Response Management Plan.

V. Reporting

A. Emergencies

IN AN EMERGENCY – CALL 911

A situation is an emergency if:

- An injury has occurred, or
- There is a serious threat to one's safety that requires immediate attention.
(Example: Someone is confronted by an angry person who indicates by words and actions intent to harm.)

⁹ *Handbook*, page 76

B. Non-Emergencies (two situations)

1. Crimes or Suspected Crimes

Conduct that does not appear to be an emergency but may constitute a crime should be reported to the CCSU Police (860-832-2375).

Right to Contact Police: Connecticut General Statutes specifically prohibits interference with the right of a student or employee to file a complaint with the police concerning crimes committed at the University.¹⁰

2. Other Behaviors of Concern

Members of the CCSU community are encouraged to report other behaviors of concern, including but not limited to behaviors that raise concern for someone's safety or well-being or for the safety or well-being of others; or behaviors that are significantly disruptive to CCSU's learning, working, or living environment. Employees in particular are required by Board policy to report behaviors that they have "... witnessed or regard as threatening or violent, when that behavior is job related or might be carried out at the university, or is connected to university employment..."¹¹ - even if one does not perceive the risk as imminent.

To report other concerns that do not appear to pose an immediate threat:

Call the office of the Vice President for Student Affairs at 860-832-1601
(Regarding student conduct)

Or

Call the office of the Chief Human Resource Officer at 860-832-1760
(Regarding employee conduct)

Or

(If necessary)
Call the CCSU Police at 860-832-2375 (24 hours a day)

¹⁰ Sec. 10a-55b.

¹¹ BR #98-48

C. ***Other Reporting Obligations***

1. **General**

- As part of the University community, all students, employees, and visitors are responsible for reporting violence they experience or witness.
- In addition to any reports to the police, all Connecticut State University System employees are responsible for notifying the *designated management representative* (any Vice President or Chief Officer of the University) of any threats they have witnessed, received, or have been told that another person has witnessed or received. Employees have an obligation to make 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.¹²
- Employees must also report such incidents to their immediate supervisor.
- Any manager or supervisor who receives a report of violent, threatening, harassing, or intimidating behavior involving employees shall immediately notify the Chief Human Resources Officer.¹³
- All parties must cooperate fully when questioned regarding violations of this policy.¹⁴

2. **Protective or Restraining Orders**

All individuals who apply for or obtain a protective or restraining order which lists University locations as being protected areas, must provide to the University (as noted below) 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.¹⁵

Students – Provide copies to the office of the Vice President for Student Affairs (860-832-1601) and the CCSU Police (860-832-2375).

Employees – Provide copies to the office of the Chief Human Resources Officer (860-832-1760) and the CCSU Police (860-832-2375).

¹² BR #98-48

¹³ Executive Order No. 16

¹⁴ Executive Order No. 16

¹⁵ BR #98-48

D. *Confidentiality*

Confidentiality of complaints and parties will be preserved to the greatest extent possible, understanding that the University may have an obligation to take some action even if a complainant is reluctant to proceed. Parties and witnesses to a complaint are also expected to maintain confidentiality of the matter, understanding that they will often not have all the facts and that they could impair the investigation by divulging information to persons outside of the investigatory process.

E. *Non-Retaliation and False Claims*

The University prohibits retaliation against persons who in good faith report violations of this policy or cooperate in an investigation. The University also prohibits the filing of knowingly false or misleading reports and providing knowingly false or misleading information in an investigation. Discipline or other action may result from either of these acts in violation of this policy.¹⁶ Also, criminal prosecution may result from knowingly filing false complaints or statements with the police.

¹⁶ State of Connecticut Violence in the Workplace Policy and Procedures Manual, p.5

RESOLUTION (BR #98-48)

concerning

**CONNECTICUT STATE UNIVERSITY SYSTEM
POLICY ON WORKPLACE
THREATS AND VIOLENCE**

July 17, 1998

- WHEREAS, The Board of Trustees for the Connecticut State University System values the safety and security of its employees, and
- WHEREAS, Threats, threatening behavior, or acts of violence against employees, students, visitors, guests, or other individuals by anyone on Connecticut State University System property will not be tolerated, and
- WHEREAS, The CSU Council of Presidents has endorsed the development of a systemwide policy on workplace threats and violence, therefore be it
- RESOLVED, That the attached document entitled "Connecticut State University System Policy on Workplace Threats and Violence" is hereby adopted, and be it further
- RESOLVED, That violations of this policy can lead to disciplinary action up to and including dismissal and criminal prosecution

A Certified True Copy:

William J. Cibes, Jr., Chancellor

**Policy on Workplace Threats and Violence
Connecticut State University System July
17, 1998**

Introduction

Recent events in Connecticut and throughout the country have highlighted the devastating effect that violence in the workplace and in our schools can have on the lives of employees, students and members of the community. The need for programs that will effectively address incidents of violence in the workplace has not been anticipated by many employers. The Connecticut State University System policy on workplace threats and violence is intended to ensure the safety and security of all employees, students and visitors to any Connecticut State System property. In addition to our policy, guidelines for implementation of the policy have been included. These are intended as benchmarks to assist in assessing the state of current practices in addressing such matters in each of our universities and in the System office.

As employers we have a moral and legal obligation to provide a safe workplace for our employees, students and visitors. However, we realize that it is not always possible to predict when a person will become violent nor is the appropriate course of action in a particular situation always readily apparent. The attached policy and guidelines, (developed and adapted from "Guidelines for Employers and Law Enforcement", Bureau of Justice Administration),

establish appropriate procedures and identify warning signs for potential violent behavior that alert employers specific actions should be initiated.

The policy requires that anyone who makes substantial threats, exhibits threatening behavior, or engages in violent acts on Connecticut State University property, shall be removed from the premises as quickly as safety permits. Determining what constitutes a "substantial threat" may be viewed as more difficult to assess than perhaps blatant behavior. A threat may be viewed as "substantial" if there is a high level of risk posed by the threat, both in severity and the likelihood it would be carried out, i.e. a death threat or physical harm. In the investigation of such threats the university should evaluate the level of risk and bring together all the necessary resources that are needed to address the situation. The development of a Threat Incident Report will insure that all threats, whether viewed as substantial or not, will be investigated and allow for proper evaluation of the incident. The policy suggests the designation of a management representative who will oversee all reports of threats or behaviors warranting potential action by the university.

Policy on Workplace Threats and Violence

The purpose of this policy is to ensure the safety and security of Connecticut State University System employees. Threats, threatening behavior, or acts of violence against employees, students, visitors, guests, or other individuals by anyone on Connecticut State University System property will not be tolerated. Violations of this policy can lead to disciplinary action up to and including dismissal and criminal prosecution.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on Connecticut State University System property shall be removed from the premises as quickly as safety permits, and shall remain off the property pending the outcome of an investigation. The university or System Office will initiate an appropriate response. This response may include investigation, 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.

All Connecticut State University System personnel are responsible for notifying the designated management representative(s) 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 at the university, or is connected to university employment. Employees have an obligation to make 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. If the designated management representatives are not available, personnel should report the threat to their supervisor or another member of the management team, or to the university police. A "Threat Incident Report" as appended to this policy should be completed as quickly as possible by the designated management representative.

All individuals who apply for or obtain a protective or restraining order which lists university locations as being protected areas, must provide to the designated management representatives 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.

The sensitivity of the information requested is understood and each university and the System Office are responsible for developing confidentiality procedures which recognize and respect the privacy of the reporting employee(s).

Each university and the System Office shall identify the designated management representative(s) and make this information, along with a copy of this policy available to all personnel.

Threat Incident Report

Board policy requires employees to report all threats or incidents of violent behavior which they observe or are informed about to the designated representative(s) who will take the steps necessary to complete a threat

incident report as quickly as possible, including private interviews of the victim(s) and witness(es). The following facts should be included in the threat incident report:

- Name of the threat-maker and his/her relationship to the university and to the recipient
- Name(s) of the 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 the incident ended
- 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

The Executive Office of Governor John G. Rowland
State of Connecticut

By His Excellency

John G. Rowland

Governor

Executive Order No. Sixteen

WHEREAS, the State of Connecticut recognizes that workplace violence is a growing problem that must be addressed; and

WHEREAS, the State is committed to providing its employees a reasonably safe and healthy working environment, free from intimidation, harassment, threats, and *for* violent acts; and

WHEREAS, violence or the threat of violence by or against any employee of the State of Connecticut or member of the public in the workplace is unacceptable and will subject the perpetrator to serious disciplinary action up to and including discharge and criminal penalties.

NOW, THEREFORE, I, John G. Rowland, Governor of the State of Connecticut, acting by virtue of the authority vested in me by the Constitution and by the statutes of this state, do hereby ORDER and DIRECT:

1. That all state agency personnel, contractors, subcontractors, and vendors comply with the following Violence in the Workplace Prevention Policy:

The State of Connecticut adopts a statewide zero tolerance policy for workplace violence.

Therefore, except as may be required as a condition of employment%

- o No employee shall bring into any state worksite any weapon or dangerous instrument as defined herein.
- o No employee shall use, attempt to use, or threaten to use any such weapon or dangerous instrument in a state worksite.
- o No employee shall cause or threaten to cause death or physical injury to any individual in a state worksite.

Weapon means any firearm, including a BB gun, whether loaded or unloaded, any knife (excluding a small pen or pocket knife), including a switchblade or other knife having an automatic spring release device, a stiletto, any police baton or nightstick or any martial arts weapon or electronic defense weapon.

Dangerous instrument means any instrument, article, or substance that, under the circumstances, is capable of causing death or serious physical injury.

Violation of the above reasonable work rules shall subject the employee to disciplinary action up to and including discharge.

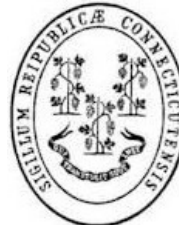
2. That each agency must prominently post this policy and that all managers and supervisors must clearly communicate this policy to all state employees
3. That all managers and supervisors are expected to enforce this policy fairly and uniformly.
4. That any employee who feels subjected to or witnesses violent, threatening, harassing, or intimidating behavior in the workplace immediately report the incident or statement to their supervisor, manager, or human resources office.
5. That any employee who believes that there is a serious threat to their safety or the safety of others that requires immediate attention notify proper law enforcement authorities and his or her manager or supervisor
6. That any manager or supervisor receiving such a report shall immediately contact their human resources office to evaluate, investigate and take appropriate action.
7. That all parties must cooperate fully when questioned regarding violations of this policy.
8. That all parties be advised that any weapon or dangerous instrument at the work site will be confiscated and that there is no reasonable expectation of privacy with respect to such items in the workplace.
9. That this order applies to all state employees in the executive branch.
10. That each agency will monitor the effective implementation of this policy.
11. That this order shall take effect immediately.

Dated in Hartford, Connecticut, this fourth day of August, 1999.


JOHN G. ROWLAND, Governor

Filed this 4th day of August, 1999.

SUSAN BVSIEWICZ, Secretary of the
State



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