

VIRGINIA MILITARY INSTITUTE
Lexington, Virginia

GENERAL ORDER)
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Workplace Violence Prevention Policy

1. Purpose

It is the intent of Virginia Military Institute to provide a safe and secure environment for Institute employees, cadets, and visitors by establishing preventive measures, assessing and intervening as appropriate with potential threats, holding perpetrators accountable, and providing assistance and support to victims. This policy specifically addresses the Institute's position on the prevention, reduction, and management of violence to provide a safe working and learning environment for our cadets, employees and visitors at all Institute owned, controlled, or leased properties, including Post buildings, grounds, classrooms, Barracks, parking lots, field locations, surrounding perimeters, alternate work or class locations, satellite locations, McKethan Park, the Stonewall Jackson House, and the New Market Battlefield State Historical Park.

2. Policy

Virginia Military Institute does not tolerate acts of violence or threats committed by or against employees, cadets, contractual workers, volunteers, visitors, or other third parties on Institute owned, controlled, or leased properties, or while conducting Institute business at any location, including representing the Institute at conferences or off-site meetings or riding in Institute owned or leased vehicles.

This policy applies to the personal conduct of an employee while functioning in the course and scope of employment, whether on or off Post, and to any off-duty violent conduct that adversely impacts a VMI employee's ability to perform his or her assigned duties and responsibilities. The personal conduct of cadets involving violations occurring off Institute property will be addressed under VMI regulations if Institute officials decide that VMI interests are involved. Sexual misconduct, to include sexual assault, sexual exploitation, dating violence, domestic violence, and stalking occurring on or off Post will be governed by General Order 16 in addition to this policy.

It is intended that all useful management strategies be employed to identify, intervene and prevent incidents of violence on Post, and provide appropriate consequences to those who threaten or perpetrate violence. VMI managers, employees and cadets are responsible for reporting perceived threats or risks of violence, and must not be subjected to any acts of retaliation for reporting concerns. VMI's Threat Assessment Team will assess and manage threats according to state guidance and "Best Practices" on threat assessment and management at institutions of higher education. VMI will use available resources such as the Employee Assistance Program, the Office of Cadet Counseling, law enforcement officials, community services boards, outside health care providers, the Commandant's Office, the Violence

Prevention Committee, and applicable personnel and cadet programs and policies in responding to alleged acts of violence and threats.

VMI shall cooperate with law enforcement and prosecutors in accordance with federal and state law.

2.1 Applicability

This policy applies to all Virginia Military Institute faculty, staff, volunteers, cadets, summer session cadets, contracted service representatives, visitors and other third parties and to all property owned, leased, operated or controlled by Virginia Military Institute.

2.2 Prohibited Conduct and Sanctions

Violence includes, but is not limited to, intimidation, threats, physical attack, domestic and dating violence, stalking, or property damage, and includes acts of violence committed by or against VMI employees, cadets, contractual workers, relatives, acquaintances, or other third parties on VMI facilities.

Prohibited conduct includes, but is not limited to, intentionally:

- Injuring another person physically;
- Engaging in verbal or physical behavior that creates a reasonable fear of injury to an identifiable person;
- Engaging in verbal or physical behavior that subjects an identifiable person to extreme emotional distress;
- Engaging in threatening or violent behavior based on race, ethnicity, gender, or other protected status;
- Defacing or damaging property;
- Threatening to injure an individual or to damage property;
- Committing injurious or threatening acts related to sexual assault, stalking, dating or domestic violence or sexual harassment;
- Brandishing a weapon or firearm, and
- Retaliating against any individual who, in good faith, reports a violation of this policy.

Verbal behavior also includes use of any method of communication such as e-mail, comments posted on websites, or other paper or electronic media.

A violation of this policy shall be considered unacceptable conduct and subject to the disciplinary actions under the appropriate faculty, staff, and cadet policies, up to and including dismissal.

Individuals who violate this policy may also be subject to arrest for violation of any applicable state criminal statute, and/or may be barred from Post.

For employees, an act of off-duty violent conduct may be grounds for disciplinary action, up to and including dismissal per applicable personnel policies.

2.3 Prohibition of Weapons

In accordance with 8 VAC 100-10-20, possession, carrying, or storage of any weapon by any person, except a police officer, is prohibited:

- (a) in all academic buildings, administrative office buildings, support buildings, military training facilities, athletic facilities, barracks or any structure designed for cadet housing, or dining facilities; or
- (b) while attending sporting, entertainment, or educational events.

For purposes of this policy, "weapons" are defined as (i) any pistol, revolver, or other weapon designed or intended to propel a missile of any kind; (ii) any dirk, bowie knife, switchblade knife, ballistic knife, razor, slingshot, sprint stick, metal knucks, or blackjack; (iii) any flailing instrument consisting of two or more rigid parts connected in such manner as to allow them to swing freely, which may be known as nun chahka, nun chuck, nunchaku, shuriken, or fighting chain; or (iv) any disc, of whatever configuration, having at least two points or pointed blades that is designed to be thrown or propelled and that may be known as throwing star or oriental dart.

Entry upon any property in violation of this prohibition is expressly forbidden. This prohibition does not apply to any individually authorized hunting or game reduction program expressly permitted by VMI officials.

In addition to individuals authorized by VMI policy, VMI police officers are lawfully in charge for the purposes of forbidding entry upon VMI property while possessing, carrying, or storing weapons in violation of this prohibition.

VMI cadets are prohibited from possessing, carrying or storing a weapon on any VMI property unless in accordance with the Cadet Weapons Policy. See Section 2.4, below and Appendix 1.

VMI employees, volunteers and parties contracting with VMI for the provision of goods or services are prohibited from possessing, carrying, or storing a weapon on any VMI property. Notwithstanding such prohibition, employees who are occupants of VMI quarters may store rifles, shotguns, handguns, knives, bows and other legal weapons which they are lawfully permitted to possess in their quarters, pursuant to rules developed and approved by the Deputy Superintendent for Finance, Administration and Support.

Visitors who are staying overnight in VMI guest accommodations in Moody Hall or the VIP quarters are prohibited from possessing, carrying or storing any weapon in such guest

accommodations, as a condition of overnight lodging in a VMI facility. Any weapons brought on post by visitors lodging overnight in a VMI facility shall be stored pursuant to rules developed and approved by the Deputy Superintendent for Finance, Administration and Support.

Any such individual who is reported or discovered to possess a weapon on VMI property in violation of this policy will be asked to remove it immediately. Failure to comply may result in arrest, employee disciplinary action and/or arrest, referral to the Commandant's Office, or bar from post.

The prohibition against storage of weapons by cadets, employees and parties contracting with VMI for the provision of goods or services includes storage of any weapon in a personal or contractor vehicle on VMI property. Visitors who may lawfully possess a weapon may store such weapon in a private vehicle if it is secured in a container or compartment in the vehicle. However, visitors are strongly encouraged to store any weapons brought on post in accordance with rules developed and approved by the Deputy Superintendent for Finance, Administration and Support.

2.4 Authorized Exceptions to Prohibition on Possession of Weapons

An employee, cadet or approved student may possess a weapon in specified locations if it is:

- Used by a cadet, employee or approved student connected with weapon training/instruction at the North Post Baffled Range Facility;
- Used by an employee who is a certified law enforcement officer employed by the VMI Police Department;
- Required as part of the employee's job duties with the Commonwealth of Virginia;
- An ROTC employee engaged in military training involving weapons.

Employees and cadets may possess and use appropriate tools, such as saws, knives, and other such implements necessary for the performance of their job duties, cadet training or school work, or for cadet recreational purposes approved by the Commandant. Permitted use and storage of VMI issued weapons (rifles, bayonets and sabers) by cadets will be governed by the Commandant's Office, and shall not constitute a violation of this policy.

VMI Rifle Team weapons can be fired at both VMI Ranges and will be stored at the Kilbourne Indoor Range or the VMI Armory as required for maintenance and will not be transported to any other location on Post.

Rules for the Skeet Club and any other club using weapons will be approved by the Commandant. The Commandant will ensure the rules for storage of these weapons in the Armory is consistent with the overall intent of this policy.

Rules for the Corps Marksmanship Program (CMP), New Cadet Military Training (NCMT) and any other shooting event sponsored by the Director of Marksmanship will be approved by the Commandant. The Director of Marksmanship will ensure the rules for storage of weapons in the

North Post Baffled Range Facility are consistent with the overall intent of this policy. Cadet and employee personally owned weapons are only authorized on the North Post Baffled Range Facility and will be stored at the range or removed from VMI property upon completion of the shooting event. All personally owned weapons will be transported to and from the NPTA range via Jordan's Point entrance (Saunders Road); if that entry way is closed the most expeditious route to the Range Facility will be utilized and stops on Post are prohibited.

The transport and handling of all weapons, both VMI owned and personally owned, will be in accordance with the published Range Standard Operating Procedures (Range SOP).

VMI owned weapons may be stored only in the VMI Armory, North Post Range, the Kilbourne Hall Range and the VMI Police Department. The gun locker in the Guard Room will be used only for temporary (overnight) storage of Skeet Club shotguns.

Exceptions to this policy may be granted only by the Office of the Superintendent. Requests for exceptions must be in writing. A request should include:

- a description of the event that requires the exception
- a detailed description of the number and types of weapons that will be on the VMI Post
- the duration (from and to dates and times)
- a list of individuals who will have weapons, or in the case of a non-employee event (for example a historical reenactment), the individuals responsible for the event and the VMI point of contact

2.5 Violence Prevention and Threat Assessment

Virginia Code §23-9.2:10 mandates the establishment of a Violence Prevention Committee and Threat Assessment Team at institutions of higher education.

As part of a larger and Institute-wide commitment to a safe Post and workplace environment, VMI is committed to the development of preventative measures, including educational programming, publicizing behavioral health resources for cadets and employees, ongoing dialogue and assessment of Violence Prevention Strategies through the Violence Prevention Committee, and assessment and management of threats according to national and regional best practices by the Threat Assessment Team. The Violence Prevention Committee also serves as a forum for the Partnership Council, established by the Memorandum of Understanding between the US Army Cadet Command and VMI, to develop strategies to prevent sexual harassment and sexual assault.

The Deputy Superintendent for Finance, Administration and Support will chair a Post-wide Violence Prevention Committee, and a sub-set of that Committee that will serve as the Threat Assessment Team, comprised of representatives of the Commandant's office, law enforcement, human resources, cadet counseling, and counsel in the Office of the Attorney General, with assessing and managing threats of violence. The mission, responsibilities, and membership of the

Violence Prevention Committee and Threat Assessment Team are outlined in General Order XX, Workplace Violence Prevention Committee and Threat Assessment Team.

2.6 Identifying and Reporting Risks

All individuals are encouraged to be alert to the possibility of violence on the part of employees, former employees, cadets, customers, and strangers. Employees and cadets shall place safety as their highest concern, and shall report all acts of violence and threatening or aberrant behavior that may represent a physical threat to the VMI community. All reports of violence will be handled in a confidential manner, with information released only on a need-to-know basis within the VMI community and in accordance with federal and state laws and regulations. Institute officials, supervisors, and the cadet chain-of-command shall be sensitive and responsive to the potential for fear of reprisal by employees or cadets who report threatening or aberrant behavior or acts of violence. Any retaliation against an employee shall be reported to the Inspector General or Human Resources Office, as appropriate. Retaliation against cadets shall be reported to the Commandant's Office.

This policy prohibits retaliation against any person, who, in good faith, reports a violation of this policy. Every effort will be made to protect the safety and anonymity of anyone who comes forward with concerns about a threat or act of violence.

See Appendix 2, "Workplace Violence/Hostility: Employee Guidelines and Procedures," for guidelines on general security practices and coping with threatening or violent individuals.

2.7 Responsibilities

It is the responsibility of every administrator, faculty member, staff member, and cadet to take any threat or violent act seriously and to report acts of violence or threatening or aberrant behavior that may represent a physical threat to the community to the appropriate authorities as set forth in this policy. Department heads and supervisors are also responsible for communicating the policy to all employees under their supervision, ensuring that facilities are as safe as feasible, identifying and providing violence prevention training to employees as appropriate, and ensuring that all employees are aware of how to report potential threats.

The VMI Police Department will coordinate all VMI action in case of a violent incident on Post or in the work place, establish and publish procedures for Post and workplace violence prevention and threat assessment, and investigate threats or incidents of violence in accordance with applicable emergency action plans. Only the VMI Police or other law enforcement agencies should attempt to apprehend the alleged offender.

The Human Resources Office will coordinate employee-related preventive measures, including coordinating employee training and communications programs, conducting criminal conviction

checks in accordance with VMI policy, advising employees and managers, and coordinating with other VMI and community resources to support victims of violence.

The Office of Cadet Counseling will coordinate cadet-related preventive measures including training for professionals and cadets through educational programming. The Institute Planning Office will develop and coordinate the VMI's emergency response plan, advise departments on the development of unit plans, and provide templates to support the development of departmental plans.

3. Procedures

3.1 Reporting Incidents

A threat which individuals are required to report pursuant to this policy includes expression of intent to cause physical harm to one's self or to others. An expression constitutes a threat without regard to whether the party communicating the threat has the present ability to carry it out, and without regard to whether the expression is contingent, conditional, or future

Faculty and staff employed by VMI are required to report imminent threats and any other non-verbal aberrant behavior that may pose a physical threat to the VMI community to the VMI Police or a member of the Threat Assessment Team. Other concerns about workplace violence can be reported to the employee's immediate supervisor or the Human Resource Office, in addition to the VMI Police or Threat Assessment Team. Mental health service providers employed by VMI or independent contractors of VMI shall report in accordance with Virginia Code § 54.1-2400.1

Cadets are required to report any threats and any other non-verbal aberrant behavior that may pose a physical threat to the VMI community to the VMI Police, a member of the Threat Assessment Team, or a member of the Commandant's staff.

All reports of conduct that may constitute sexual misconduct, including sexual assault, sexual exploitation, domestic violence, dating violence, or stalking, should also be made to the Institute's Title IX Coordinator in accordance with GO 16.

3.2 Support for Victims of Violence

VMI shall make efforts to provide a workplace free from violence and to protect and support victims and those threatened or exposed to acts or threats of workplace violence by offering security measures and identifying appropriate resources for providing support and assistance. Every effort will be made to protect the confidentiality and safety of anyone who reports a potential violation of this regulation or otherwise raises concerns about a threat or act of campus violence. All reports will be handled in as confidential manner as possible, with information released only on a need-to-know basis or as required by law. Victims may also need special

accommodations or adjustments to their work or class schedule, location or working conditions in order to enhance their safety. VMI shall accommodate these requests and needs whenever possible and appropriate. VMI shall provide interim resources and measures to victims of sexual misconduct in accordance with GO 16.

FOR THE SUPERINTENDENT:

James P. Inman
Colonel, US Army (Ret.)
Chief of Staff

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OPR: FAS

Appendix 1

Cadet Weapons Policy -- Extract from VMI Regulations Part III

CHAPTER 3 – Weapons

SUMMARY

- Cadets will keep positive control over VMI issued weapons at all times
- Cadets are not authorized to bring personal weapons to VMI, with the exception of the Skeet Club
- Skeet Club members allowed to bring weapons to VMI must follow authorized storage procedures as described in the Skeet Club permit
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1. VMI ISSUED WEAPON

- a. Cadets are responsible for the security, accountability and maintenance of their assigned weapon and bayonet at all times.
- b. Loss of a weapon or bayonet is a serious offense and must be reported, through the Cadet chain of command, to the Assistant Commandant S4.
- c. Bayonets are only drawn from scabbards for cleaning and maintenance, or as directed at parades and formations.
- d. Cadets must:
 - (1) Not bang rifles on the ground or stoop.
 - (2) Keep weapons on Post at all times unless participating in an approved VMI activity.
 - (3) Turn in issued weapons to the armory when directed.
 - (4) Inform the armory when a weapon has been damaged.

2. PRIVATELY OWNED WEAPONS

Cadets are not authorized to bring personal weapons onto VMI. The only exception to this policy is for cadets who are current members of the Skeet and Marksmanship Clubs. The registration, storage and handling procedures of weapons belonging to Skeet Club members are described in the Skeet Club permit. The registration storage and handling of personally owned weapons at the North Post Baffled Range must be approved by the Director of Marksmanship IAW the Range SOP and Marksmanship Club Permit. Any other cadet or group of cadets wishing to bring a privately owned weapon to VMI for official business must submit a permit to the Superintendent through the Commandant's office.

3. VIOLATION OF WEAPONS POLICY

Cadets found to be in violation of the weapons policy are subject to a penalty ranging from dismissal to a number 5.

4. The Assistant Commandant S1 is the point of contact for this chapter.

Appendix 2

Workplace Violence/Hostility: Employee Guidelines and Procedures

While VMI endeavors to provide employees with a safe and secure workplace, VMI recognizes that crime and violence sometimes can spill over into the workplace. We are providing you with these guidelines so you can be better prepared to handle violent and threatening situations. This document summarizes actions you should and should not take to deal with threatening or violent situations. Taking a few moments to familiarize yourself with these guidelines is an important part of being prepared for workplace emergencies.

General Security Practices

- Never hesitate to call the police if confronted with a potentially violent situation. It is better to have called the police unnecessarily than not to have the police available when a threatening situation turns violent.
- Never attempt to physically restrain or physically remove a threatening or violent individual by yourself. Doing so puts you in danger and leaves you and VMI vulnerable to possible lawsuits.
- **Always report violent, threatening, or harassing behavior to your supervisor and the VMI Police. Alert your supervisor or the VMI Police to the presence of strangers in your work area or the presence of any suspicious packages.**
- In the event of armed robbery, comply with the robber's demands, including demands for VMI money or property.
- VMI employees who have a protective order or restraining order which covers them at work should notify their supervisor and provide a copy of the order to the VMI Police Department

Guidelines for Violent Incident Response

The potential for violent incidents in the workplace is an unfortunate reality. As these incidents generally occur without warning, every member of the VMI community should always be prepared. Workplace violence may include physical assaults, active shooters, terrorism and more.

All members of the VMI Police Department are trained in nationally recognized rapid intervention tactics to respond to and neutralize immediate threats to life and safety. The following recommendations will help you take appropriate actions to protect yourself and will assist law enforcement in their response. No matter what happens, try to remain calm. Your behavior will influence those around you.

Remember **Escape, Hide, Fight**. Escape should always be your first goal. If that is not possible, hide in a secure location. Fighting should be your last resort, only if escaping and hiding are not possible.

Escape

- **Have an escape route and plan in mind.**
 - Listen to try and judge where sounds of violence are coming from.
 - Consider escape through windows or access panels.
- **Go quickly and quietly.**
 - Leave your belongings behind.
 - Silence your cell phone.
 - Call 911 after you are safe.
- **Commit to your plan.**
 - Evacuate regardless of whether others agree to follow.
 - Help others escape, if possible.
 - Do not attempt to move wounded people
- **Keep your hands visible.**
- **Follow the instructions of any police officers you encounter.**
- **Prevent others from entering an area where the assailant may be.**

Hide

- **Securing the immediate area:**
 - Lock or barricade the door, if you can. Use whatever is available – desks, tables, file cabinets, other furniture, books, etc.
 - If there are no items available to barricade the door, lie flat on the floor with your feet against the door and use your body weight as a barricade.
 - After securing the door, stay behind solid objects away from the door as much as possible.
 - If the assailant enters your room and then leaves, lock or barricade the door behind them to prevent them from returning.
 - If safe to do so, allow others to seek refuge with you.
- **Un-securing the Area:**
 - The assailant may not stop until his objectives have been met or until they are neutralized by law enforcement.
 - Always consider the risk of opening the door for any reason.
 - Attempts to rescue people only should be made if it can be done without further endangering the persons already inside of a secured area.

- Be aware that the assailant may bang on the door, yell for help, or otherwise try to convince you to open the door of a secured area.
- If there is any doubt about the safety of the individuals inside the room, the area needs to remain secured.
- **Protective Actions.**
 - Close blinds.
 - Block windows.
 - Turn off lights.
 - Turn off radios and computer monitors.
 - Silence cell phones.
 - Place signs in exterior windows to identify your location and the location of injured persons.
 - Keep people calm and quiet.
 - After securing the room, people should be positioned out of sight and behind items that might offer additional protection – walls, desks, file cabinets, bookshelves, etc.
- **Open Areas:**
 - If you find yourself in an open area, immediately seek protection.
 - Put something between you and the assailant.
 - If in doubt, find the safest area available and secure it the best way that you can.
- **Call 911.** Be prepared to provide the 911 operator with as much information as possible in a calm clear manner, such as the following:
 - What is happening.
 - Where you are located, including building name and room number.
 - Number of people at your specific location.
 - Injuries, if any, including the number of injured and types of injuries.
 - Your name and other information as requested.
 - Specific location and direction of the assailant.
 - Number of assailants.
 - Gender, race, and age of the assailant.
 - Language or commands used by the assailant.
 - Clothing color and style.
 - Physical features – e.g., height, weight, facial hair, glasses.

- Type of weapons – e.g., handgun, rifle, shotgun, explosives.
- Description of any backpack or bag.
- Do you recognize the assailant? Do you know their name?
- What exactly did you hear – e.g., explosions, gunshots, etc.
- **Treat the Injured.** EMS will respond to the site, but will not be able to enter the area until it is secured by law enforcement. You may have to treat the injured as best you can until the area is secure. Remember basic first aid:
 - For bleeding apply pressure and elevate. You can use many items to do this, such as clothing, paper towels, feminine hygiene products, newspapers, etc.
 - Reassure others that help will arrive – try to stay quiet and calm.

Fight

- **When the shooter is at close range and you cannot flee or hide:**
 - Your chance of survival is much greater if you try to incapacitate him/her.
 - This should be a last resort when your life is in imminent danger.
 - Consider using items such as chairs, lamps or fire extinguishers as weapons.
 - Your goal is to protect yourself and create an opportunity for escape.

When Law Enforcement Responds

- **Officers' first goal is to stop the assailant and prevent further casualties.**
 - The first officers to arrive will not stop to treat the injured or evacuate anyone.
 - Officers may be wearing uniforms, be in plain clothes with badges displayed, or in tactical uniforms, including bullet proof vests and helmets. There may be officers from several jurisdictions, all in different uniforms.
 - Officers may point weapons at you, shout commands or push you to the ground or towards the direction of escape. Comply with their commands.
 - Stay where you are and keep your area secured until instructed to do otherwise.
 - Do not attempt to detain the officers or ask questions.
 - It may take some time for you to be evacuated. Be patient. Your safety is the officers' first priority.
 - When being evacuated, follow directions exactly.

- Once you are evacuated, you may be taken to a holding area to be identified, treated for injuries or interviewed. This is important for safety and accountability. Remain there until told that you can leave.
- **Officers must consider the possibility that the assailant(s) are posing as victims to avoid detection or ambush them.**
 - Remain calm and follow instructions
 - Put down any items in your hands (i.e., bags, jackets)
 - Keep hands visible at all times. Raise hands and spread fingers.
 - You may be searched.
 - Avoid quick movements toward officers, such as holding on to them for safety.
 - Avoid pointing, screaming or yelling.