Workplace Violence Prevention Program

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# Introduction

**Look for instructions in blue where you should add specific details for your organization.**

This **Workplace Violence Prevention Program** aids **[Company Name]** in protecting workers from physical and mental harm at work. It adds to the Company’s existing and effective Injury and Illness Prevention Program. This plan is maintained in accordance with [California’s Senate Bill 553](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB553), but conscientious employers in other states can also implement it at their discretion.

According to the U.S. Bureau of Workplace Statistics, in 2020, the most recent year for which statistics are available, there were **392 workplace homicides** and **37,060 nonfatal injuries** in the workplace resulting from an intentional injury by another person. Service occupations have the highest incidences of workplace violence, but any industry is susceptible. Researchers at the Harvard Injury Control Research Center have also shown that the U.S. has the highest rate of civilian gun ownership globally. While the link between guns and violence is not definitive, the U.S. has more firearm-related deaths, suicides, and accidents than other high-income countries.

Please consult with competent legal professionals and experts as needed to implement all of the initiatives discussed herein.

## Company Name

**State the company names that the policies outlined within this document apply to.** Throughout the following pages these organizations are collectively referred to as the “Company.”

## Definitions

**Workplace violence** is any act or threat of violence, harassment, intimidation, or other threatening, disruptive behavior that can occur on the job. It does not include lawful acts of self-defense or the defense of others.

### Examples of Violence Among Coworkers

According to the U.S. Department of Labor, there are many forms of workplace violence. Unfortunately, the one that receives the most attention is workplace homicide. However, there are far more incidents of violence that DO NOT involve casualties but still evoke trauma.

The most frequently encountered situations among coworkers are:

* Concealing or using a weapon.
* Physical assault upon oneself or another person.
* Actions that damage, destroy, or sabotage property.
* Intimidating or frightening others.
* Harassing, stalking, or showing undue focus on another person.
* Physically aggressive acts, such as shaking one’s fists at another person, kicking, pounding on desks, punching a wall, angered movements, or screaming at others.
* Verbal abuse including offensive and profane or vulgar language.
* Threats (direct or indirect), whether made in-person or through letters, phone calls, emails, etc.

### Types of Workplace Violence

A combination of one or more types of workplace violence may exist in the Company’s workplace:

* **Type 1** violence is committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
* **Type 2** violence is directed at employees by customers, clients, patients, students, inmates, or visitors.
* **Type 3** violence is done by an existing or former employee, supervisor, or manager.
* **Type 4** violence is committed in the workplace by a person who doesn’t work there but has or is known to have had a personal relationship with an employee.

## Plan Review

**The Company will review this plan at least annually**. Plan updates will include actively involving employees and authorized employee representatives. The plan will also be updated when a deficiency is observed or becomes apparent and after a workplace violence incident. Changes in federal, state, or local regulations that may reasonably affect workplace violence prevention will also prompt plan updates.

**Direct suggested changes or other feedback on this plan to:**

## 

## Revision History

|  |  |  |  |
| --- | --- | --- | --- |
| Review | Reviewed By | Changes | Effective Date |
|  |  |  |  |
|  |  |  |  |

# Scope

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## Effective Date

This plan is effective as of **[MM/DD/YYYY]**.

## Purpose

This plan is used in conjunction with the Company’s Injury & Illness Prevention Program. The purpose of the Workplace Violence Prevention Program is to identify:

* Procedures for workplace violence hazard identification, evaluation, and correction.
* Steps for proper investigation and resolution of violent incidents.
* How to record information in a Violent Incident Log for every violent workplace incident, as specified.
* Effective employee training on this Workplace Violence Prevention Program, among other things.
* How to address when a new or previously unrecognized workplace violence hazard has been identified and communicating to employees when changes are made to this plan.
* When and how to share certain records with employees, employee representatives, and government officials as specified.

## Applicability

This plan applies to all Company employees and all other workers that the Company controls, directs, or supervises on the job to the extent these workers are exposed to worksite and job assignment-specific hazards. This plan is designed to help prevent workplace violence.

### Exclusions

The following employers, employees, and places of employment are exempt from this Workplace Violence Prevention Program.

* **Healthcare facilities**, service categories, and operations covered by Section 3342 of Title 8 of the California Code of Regulations.
* **Facilities operated by California’s Department of Corrections and Rehabilitation** that comply with Section 3203 of Title 8 of the California Code of Regulations.
* Employers that are **law enforcement agencies** that are a “department or participating department,” as defined in Section 1001 of Title 11 of California’s Code of Regulations and that received confirmation of compliance with the Commission on Peace Officer Standards and Training (POST) Program from the POST Executive Director in accordance with Section 1010 of Title 11 of the California Code of Regulations. However, an employer shall be exempt only if all facilities operated by the agency are in compliance with Section 3203 of Title 8 of the California Code of Regulations.
* **Employees teleworking from a location of the employee’s choice**, which is not under their employer’s control.
* Places of employment where there are **less than 10 employees** working at the place at any given time and who are not accessible to the public.

## Overall Responsibility & Accountability

### Plan Administrator(s)

**The Company has designated the following person or people to implement, coordinate, and maintain this plan.**

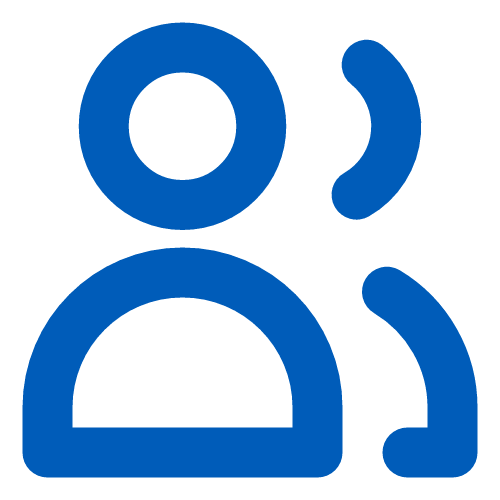
|  |  |  |
| --- | --- | --- |
| Full Name | Job Title | Workplace Violence Prevention Role |
|  |  | *Trainer, Administrator, etc.* |
|  |  |  |

### Supervisors, Managers & Company Leadership

All Company managers and supervisors are responsible for:

* Implementing, modeling, and maintaining the principles of this plan and workplace violence prevention strategies in their work areas.
* Ensuring that all workplace security policies and procedures are clearly communicated and understood by all workers.
* Enforcing the rules fairly and uniformly.
* Answering related worker questions.

### Employees

Company workers will follow all workplace security directives, policies, and procedures, and assist in maintaining a safe work environment.

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# Detection

Organizations with one or more of the following factors inherently have a higher risk for violence in their workplaces:

1. Exchange of money.
2. Employees who work alone.
3. Employees who work at night and during early morning hours.
4. Availability and guarding of valued items, e.g., money and jewelry.
5. Provision, use, or distribution of alcohol or marijuana.
6. Perform public safety or social service functions in the community.
7. Work with patients (healthcare facilities not within the scope of CCR, Title 8,section 3342) clients, passengers, customers, or students known or suspected to have a history of violence.
8. Workers with a history of assaults or who have exhibited belligerent, intimidating, or threatening behavior to others.

## Behavior Indicators

While workplace violence may occur without warning, there is often a **pattern of escalating incidents** that provide clues that things may be heading in a concerning direction.

### Level I: Early Warning Signs

A person is being:

* Intimidating or bullying
* Discourteous or disrespectful
* Uncooperative
* Verbally Abusive

### Level II: Escalation

A person is:

* Arguing with customers, vendors, coworkers, or management
* Refusing to obey Company policies and procedures
* Sabotages equipment or stealing Company property
* Verbalizing a wish to hurt coworkers or management
* Sending threatening notes to coworkers or management
* Seeing themselves as victimized by management

### Level III: Emergency

A person is exhibiting or engaged in:

* Suicidal threats
* Physical fights
* Destruction of property
* Extreme rage that is possibly disproportionate to the situation
* Using weapons with the intent to harm themselves or others

## Hazard Detection & Documentation

Employers must have a system for identifying and evaluating workplace hazards, including the potential for violence.

Specifically, the Company’s systems to ensure that workers comply with workplace violence prevention rules and maintain a secure work environment are:

* Informing workers about the provisions of this plan.
* Evaluating workers’ performance.
* Identifying and coaching workers who perform work that may increase their risk of workplace violence on how they can protect themselves.
* Providing employee training.
* Discipline up to and including employment termination for workers who fail to comply with workplace violence prevention practices.
* A reporting path either to their supervisor or anonymous submission for workers who observe worrisome behaviors or acts of workplace violence.
* Allowing workers to access communication means to seek emergency assistance, assess the safety of a situation, or communicate with someone to verify their safety.

**Describe any additional methods that the Company has adopted to ensure worker compliance.**

## Inspections & Observation

Periodic inspections and reviews to identify and evaluate workplace security and violence hazards will be performed by competent observers in the following workplace areas.

|  |  |  |
| --- | --- | --- |
| Competent Observer | Job Title | Area |
|  |  |  |
|  |  |  |

### Initial Inspection

Assessing fundamental aspects of the building’s physical security and business practices can yield simple, zero-cost or low-cost changes that improve worker safety.

| P | # | Task | Evaluation Items |
| --- | --- | --- | --- |
|  | 1 | Is the exterior or interior of the workplace attractive to thieves? | * Limited lighting * No security system (cameras, mirrors, etc.) * Broken windows, doors, locks, light bulbs, etc. |
|  | 2 | Are signs posted indicating limited cash is kept on-site? | * Legible sign in visible area |
|  | 3 | Do employees know what to do in the event of a robbery or another crime? | * Q&A * Safe simulation |
|  | 4 | Do employees know how to accurately assess suspicious activity without racial profiling? Do they know how to report it? | * Q&A |
|  | 5 | Are emergency buttons and alarms in an effective location? Do all of them work? | * Controlled test, coordinated with law enforcement, as necessary |
|  | 6 | Do employees have rapid access to a list of emergency telephone numbers for security, law enforcement, fire, and medical services? | * Legible, up-to-date sign in visible area |
|  | 7 | Is the amount of cash kept on the premises limited? Are time access safes used for large bills? | * Physical observation and inspection |
|  | 8 | Do workers have effective escape routes from the workplace? Is there a designated safe area where they can go in an emergency? | * Physical observation and inspection |
|  | 9 | Can doors and rooms be locked? | * Physical observation and inspection |
|  | 10 | Do workers have access to a telephone with an outside line? | * Physical observation and inspection |
|  | 11 | Does the facility have visitors check in at an entrance station to be identified and granted clearance before they proceed into the workplace? | * Physical observation * Safe simulation |
|  | 12 | In a business receiving public visitors, are there areas which are restricted to employees only? Are they secured from unauthorized access? | * Physical observation * Safe simulation |

### Frequency

The above inspection will be completed:

1. When Company initially adopted this Workplace Violence Prevention Program.
2. When new workplace security hazards are introduced into the workplace.
3. When new, previously unidentified workplace security hazards are recognized.
4. When workplace security incidents occur.
5. When Company hires and/or reassigns permanent or intermittent workers to processes, operations, or tasks for which a workplace security evaluation has not yet been conducted.
6. Whenever workplace security conditions warrant an inspection.

### Advanced Analysis & Inspection

As warranted, the Company may work with law enforcement or other experts to assess the following aspects of workplace security and response.

* Access to and freedom of movement within the workplace, including non-workers, recently discharged workers, or persons with whom one of the Company’s workers is having a dispute.
* Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
* Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
* Workers’ skill in safely handling threatening or hostile service recipients.
* Effectiveness of systems and procedures that warn others of a security danger or that summon assistance (e.g., alarms or panic buttons).
* The use of work practices such as the “buddy” system for specified emergency events.
* How well the Company’s anti-violence policy has been communicated to workers, supervisors, and managers.
* How well Company’s management and workers communicate with each other.
* Company workers’, supervisors’, and managers’ knowledge of the warning signs of potential workplace violence.
* Frequency and severity of workers’ reports of threats of physical or verbal abuse by managers, supervisors, or other workers.
* Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.
* Worker disciplinary and discharge procedures.

## Employee Participation

Employees are encouraged to report concerns about workplace security, workplace violence, or any other job matters.

**Describe how Company employees can submit concerns or safety suggestions anonymously.**

### Instructions to submit a suggestion in KPA’s Vera Suite

**Instructions**

1. Go to [www.VeraSuite.com](http://www.VeraSuite.com). Enter **KPAMSDS** as the username and your KPA client ID/pin as the password. The pin number is on your Safety Data Sheet (SDS) poster.
2. Click on the **Suggestions** tab.
3. Add your idea. **Submit**.

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# Correction

The Company does not tolerate harassment or violence of employees, customers or clients, vendors, or suppliers. Any form of harassment or violence that violates federal, state, or local law will be treated as a disciplinary matter up to and including termination. For these purposes, the term “harassment” includes slurs and any other offensive remarks, jokes,   
or other verbal, graphic, or physical misconduct.

## Investigation Procedures

The Company will appoint at least 2 people to conduct the following activities after a workplace violence concern is reported or a non-emergency incident occurs. See the [Workplace Violence Emergencies](#_Workplace_Violence_Emergencies) section of this plan for guidance responding to life-threatening incidents. Safety is paramount and involving law enforcement may be necessary.

1. Visit the incident scene as soon as possible.
2. Interview threatened and injured workers and witnesses.
3. Examine the workplace for factors associated with workplace security, including any previous reports of inappropriate behavior by the perpetrator.
4. Determine the cause of the incident.
5. Take corrective action to prevent the incident from reoccurring.
6. Record the findings and corrective actions taken. Notify involved employees about the results of the investigation.
7. Produce a written incident report that includes the date, time, location, description of the type of the event and circumstances leading up to it, as well as the identity of the persons involved.

## Actions Hierarchy

Hazards that pose a higher risk for violence in the workplace will be corrected in a timely manner, based on the severity of the hazards. The higher the risk of violence, the greater priority the Company will take in correcting the matter. Hazards will be corrected according to the following procedures:

1. When first observed or discovered.
2. If an imminent hazard exists that cannot be immediately abated without endangering worker(s) and/or property, all exposed workers will be removed from the situation except those necessary to correct the existing condition. In escalating or emergency situations, law enforcement shall resolve the matter.
3. All corrective actions taken and the dates that they are completed will be documented.

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# Workplace Violence Emergencies

Any individual observing violent or threatening behavior that poses an immediate danger to themselves, others, or Company property is expected to:

* **Call 911** or other appropriate emergency contacts for that particular facility, particularly if the situation requires immediate medical and/or law enforcement personnel.
* Remain calm and contact your supervisor.
* Secure your personal safety first.
* Leave the area if your safety is at risk.
* Cooperate with law enforcement personnel when they respond to the situation.

## Alert System

To signal an evacuation, the facility uses an evacuation notification alarm. The evacuation alarm system is communicated to employees upon hire and is reviewed during re-training sessions. The alarm is distinct and clear so as not to be confused with other forms of communication.

**The Company uses the following methods to signal the need for evacuation. Check all that apply.**

Verbal communication

Audible alarm

Facility telephone or announcement system

Visual alarm

Pull box alarm system

Mass electronic device communication

Activation of this notification signals all facility employees must stop working and proceed to their evacuation assembly points.

## Evacuation vs. Shelter in Place

Certain circumstances, such as workplace violence events or active shooter situations, may necessitate a facility evacuation. All employees have the right to evacuate a facility if they are in immediate danger.

However, if it is too dangerous or you will cross paths with a perpetrator, sheltering in place may be safer. Sheltering in place means finding a safe location inside the facility and staying there until you are cleared by law enforcement. The Company has designated shelters in place, but if you can’t make your way to one of them without endangering yourself:

* Look for a room, preferably one with a locking door.
* Does the door open inward or outward?
* Can you close or block any windows?
* Can you barricade furniture against the door to reinforce it?
* Turn off the lights and silence your phone.

**Add recommended shelter-in-place locations at the facility.**

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# Communication & Training

The Company recognizes that open, two-way communication between management and staff about workplace security issues is essential to a safe and productive workplace. Our communication methods facilitate a continuous flow of workplace security information between management and staff in a form that is readily understandable by all affected workers, and consists of one or more of the following:

* New worker orientation including workplace security policies and procedures.
* Review of this plan.
* Workplace security training programs.
* Regularly scheduled meetings.
* Effective communication between workers and supervisors about security and violence concerns, including translation where appropriate.
* Posted or distributed workplace security information.
* A system for workers to anonymously inform management about workplace security and violence concerns.
* A system for workers to inform management about workplace security hazards or threats of violence without fear of reprisal or adverse action.
* Address security issues at our workplace security team meetings.

**Check the one that is applicable to the Company.**

The Company has less than 10 employees and communicates with and instructs workers orally about general workplace security practices, and workplace security hazards that are unique to each worker’s job assignment.

The Company has appropriate labor/management safety and health committees that:

* Meet regularly.
* Prepare written records of the safety and health committees’ meetings.
* Review periodic and scheduled inspection results.
* Review workplace security concerns, investigation findings, and incidents.
* Make suggestions to management about preventing future incidents.
* Review investigations of alleged hazardous workplace security conditions.
* Submit recommendations to assist in evaluating workplace security.

**Enter any other methods of effective communication that the Company uses.**

## Plan Availability

This written plan shall be available and easily accessible to employees, authorized employee representatives, and government representatives at all times. This is accomplished through both hard copies and electronic systems, such as an employee internet portal or similar. Employees may also request a copy of the plan from the company’s Administrator.

## Non-Retaliation

The Company will not take adverse action nor retaliate against employees in any way if they report workplace violence concerns or if they refuse to report to work or leave a workplace or worksite because they have a reasonable belief that the workplace or worksite is unsafe.

## Training Elements

The Company shall use training material that’s appropriate in content and vocabulary to employees’ educational level, literacy, and language. **Note:** The “Workplace Violence and Active Shooter Response” online training course is available in KPA software for Company employees to complete.

At a minimum, the following topics will be covered as part of the Company’s emergency response and antiviolence training:

* The details of this Workplace Violence Prevention Program, how to obtain a copy of it at no cost, and how to participate in the plan.
* Definitions and requirements, including recognizing workplace security hazards and the risk factors associated with the 4 types of workplace violence.
* How to report any violent acts or threats of violence to the Company or law enforcement without fear of reprisal.
* Workplace violence hazards specific to the employees’ jobs, the corrective measures the Company has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
* How and when to use the required violent incident log.
* An opportunity for interactive questions and answers with a person knowledgeable about the Company’s antiviolence measures.
* Ways to defuse hostile or threatening situations.
* How to recognize alerts, alarms, or other warnings about emergency conditions, and how to use identified escape routes or locations for sheltering.
* Measures to summon others for assistance.
* Worker escape routes.
* Notification of security and law enforcement authorities when a criminal act may have occurred.
* The method for emergency medical care provided in the event of any violent act upon a worker.
* Availability of post-event trauma counseling for workers desiring such assistance.

## Training Schedule

All affected workers, including managers and supervisors, will have training and instruction on general and job-specific safe workplace security practices and violence prevention. Training and instruction will be provided as follows:

* When this Workplace Violence Prevention Program is first established and annually thereafter.
* To all new workers.
* To all workers given new job assignments for which training has not been provided.
* Whenever new workplace security concerns are introduced to the workplace and represent a new hazard.
* Whenever the Company is made aware of a new or previously unrecognized workplace security hazard. The additional training may be limited to addressing the new workplace violence hazard or changes to this plan.
* To supervisors so that they can recognize the workplace security hazards to which workers under their immediate direction and control may be exposed.
* To all workers with respect to workplace security hazards specific to each worker's job assignment.

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# Recordkeeping

In accordance with laws and legal best practices, the Company keeps records of workplace violence hazard identification, evaluation, and correction for a minimum of 5 years.

## Additional Records Practices

* Records of workplace security hazard assessment inspections, including the person(s) conducting the inspection, the workplace security concerns identified, and the action taken to correct the identified concerns, are recorded on a hazard assessment and correction form.
* Training records shall be created and maintained for a minimum of 1 year and include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions.
* Violent incident logs shall be maintained for a minimum of 5 years.
* Records of workplace violence incident investigations conducted shall be maintained for a minimum of 5 years. These records shall not contain “medical information.”
* All required records shall be made available to authorities upon request for examination and copying.
* All required records shall also be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request.

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### Appendix A: Violent Incident log

**INSTRUCTIONS:** Enter complete information about a workplace violence incident, ensuring that you fill out all the columns of this form. Retain for at least 5 years.

**Person Completing This Log**: **Date Completed:**

**Job Title**:

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Date of Incident | Time of Incident | Location of Incident | Location Classification (Workplace, Parking Lot, Area Outside Workplace, Other) | Type of Incident (Physical Attack Without Weapon, Attack With Weapon, Threat, Sexual Assault, Animal Attack, Other) | Workplace Violence Type  (I, II, II, or IV) | Detailed Description | Who Committed the Violence (Client, Immediate Family Member, Friend, Stranger, Supervisor, Partner/Spouse, Parent, Relative, Other) | Employee Circumstances (Doing usual job duties, Poor lighting, Rushed, Low staffing, Alone, Unable to get help, Community setting, Unfamiliar work location) | Incident Actions (Security/Law Enforcement Involved, Corrections) |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |