Workplace Violence Prevention Plan

2025-2026





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Commitment to Preventing and Addressing Workplace Violence

We are committed to creating a positive, caring, and safe work environment, which includes taking the initiative to maintain a secure work environment and practice safe work habits. This Workplace Violence Prevention Plan (WVPP or Plan) for Cathedral School for Boys (CSB) is designed with our school values in mind while complying with the applicable law. It operates with other school workplace safety policies, including our Emergency Operations Plan.

The WVPP aims to protect employees, students, visitors, families, and vendors from any threat of violence or workplace violence and effectively address such incidents should they arise. The WVPP does not apply to employees teleworking from a location that is not under CSB's control.

You should be familiar with CSB's WVPP and your role in preventing and addressing incidents of workplace violence. If you have questions, your supervisor, the WVPP Administrator, and the administrative team can answer them. Thank you for all you do to create and foster a safe and secure work environment.

The Workplace Violence Prevention Plan (WVPP) must be designed to complement our Comprehensive School Safety Plan (CSSP), Emergency Operation Plan (EOP), and Continuity Of Operations Plan (COOP). As with emergency preparedness concepts developed through the Incident Command System (ICS), ensuring multiple departments, processes, and agencies work together during a critical incident requires integration among these plans.



Background

On September 12, 2023, the California legislature passed another piece of meaningful legislation to protect California workers from workplace violence, authored by Senator Cortese. California State Senate Bill 553 sent a sweeping employee protective mandate to employers across the state, requiring almost all California businesses to develop their own unique and specific workplace violence prevention plan (WVPP), either as part of their Division of Occupational Safety and Health (more commonly known as Cal/OSHA) Injury and Illness Prevention Plan (IIPP) or as a standalone policy. SB 553 further mandates that all employees must be informed of these plans and trained yearly on them via interactive training.

On September 20, 2023, SB 553 was signed into law by California Governor Gavin Newsom. SB 553 officially created and implemented the first general industry workplace violence prevention safety requirements in the United States. Under SB 553, almost all California employers are required to take proactive steps to prevent and respond to incidents of workplace violence. Specifically, SB 553 adds section 6401.9 to the California Labor Code. On or before July 1, 2024, California businesses that are required to comply with SB 553 must establish, implement, and maintain an effective workplace violence prevention plan.

While it is acknowledged that a WVPP will not prevent all occurrences of violence, the planning, training, and increased awareness of workplace violence will improve CSB's ability to identify potential violence risks and take steps to ensure these risks are mitigated through a layered approach to violence prevention.

Specifically, this systemic prevention plan will

- help reduce the risk to employees through identification and reporting of potential violence risk supported through ongoing training and educational efforts
- help identify potential risks from domestic and partner violence by educating employees about risk factors and encouraging the sharing of concerns
- assist employees in their preparedness in responding to emergencies (fire, flood, hazmat, earthquake, active assailant, medical emergencies and evacuation
- ensure reporting and intervention efforts related to current and past threats between employees or the public
- assess and address changes stemming from a physical safety and security walkthrough and audit based on Threat, Vulnerability, and Risk Assessment (TVRA) and Crime Prevention Through Environmental Design (CPTED) principles.

This document establishes the Cathedral School for Boys Workplace Violence Prevention Plan and applies to the following workplace: 1275 Sacramento Street, San Francisco, CA 94108.



Requirements of Workplace Violence Prevention Plan

SB 553 requires the following to be part of any WVPP. These items are specifically addressed throughout this plan through the checklist in <u>Appendix D</u>. These items are:

- Specific designation of the person or persons responsible for implementing the plan.
- Effective procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan.
- Methods to coordinate the plan with other employers, when applicable, to ensure that employees and employers understand their respective roles, as provided in the plan.
- Effective procedures for the employer to accept and respond to reports of workplace violence and to prohibit retaliation against an employee who makes such a report.
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the plan.
- Effective procedures to communicate with employees regarding workplace violence, including:
 - How an employee can report a violent incident, threat, or other workplace violence concern to the employer or law enforcement without fear of reprisal.
 - How employee concerns will be investigated, how employees will be informed of the investigation results, and any corrective actions to be taken as part of the employer's responsibility under this law.
- Procedures to identify, evaluate, and correct workplace violence hazards, including scheduled periodic inspections.
- Procedures for post-incident response and investigation.
- Procedures to review the plan's effectiveness and revise the plan as needed, including plans for the active involvement of employees and authorized employee representatives.
- Initial interactive and collaborative training about the plan when first established and annual training thereafter.
- Employers to keep specific records related to workplace violence, including:
 - Records of workplace violence hazard identification, evaluation, and correction.
 - Training records.
 - A violent incident log for every workplace violence incident.
 - Records of workplace violence incident investigations.
- Update plan with procedures or other information required by the division and standards board as being necessary and appropriate to protect the health and safety of employees



Responsibility

The WVPP administrator/point person has the authority and responsibility to implement the provisions of this plan for CSB. They will work in tandem with a Safety Committee tasked with establishing, implementing, and monitoring the plan. While the Safety Committee will ensure the plan's day-to-day operations, the administrator is the project manager who will keep any committee or team on task to comply with state and federal regulations and coordinate support for the resources needed for compliance. All of those identified below are responsible for ensuring the CSB does not retaliate or discriminate against any employee who reports workplace violence or cooperates in an investigation of workplace violence.

Staff	Role	Position	Contact
Melisa Seward Block	WVPP Responsible Person	Chief Finance & Operations Officer	Work phone: (415) 614-5115 Cell phone: (415) 815-6045
Susan Lande	Safety Committee Director	Front Desk Operations Manager	Work phone: (415) 614-5100 Cell phone: (612) 239-2809
Johnny Perez	Safety Committee Training Coordinator	Maintenance Technician	Work phone: (415) 614-5151 Cell phone: (415) 218-1031
XXX	Safety Committee Documentation and Records Coordinator	XXX	XXX

Staff	Role	WVPP Responsibilities
Melisa Seward Block	WVPP Responsible Person	 Ensure the plan is established, implemented, and maintained through conversations with the Safety Committee Director Assess similar business's WVPPs and determine areas for growth and improvement Review Violent Incident Log reports through the Safety Committee Director to ensure compliance and how they are shared with the state
Susan Lande	Safety Committee Director	 Oversee the compliance checklist for the WVPP and address any areas that are out of compliance Solicit and receive suggestions and comments regarding this plan, workplace violence, hazards, and procedures



		 Ensure employees can share concerns via paper report, verbal conversation, and/or online form Ensure workplace hazards are regularly assessed and addressed Develop and implement an employee survey to assess workplace violence risks (<u>Appendix G</u>)
Johnny Perez	Safety Committee Training Coordinator	 Provide a copy of the WVPP to all employees Talk with employees about concerns they may have and encourage them to contribute and review the WVPP Collect feedback through feedback forms as well as conversations with employees Ensure workplace hazards are regularly assessed and addressed Oversee training schedule for upcoming trainings Update training materials to ensure they are accessible and understandable to all employees Coordinate (with the Safety Committee Director) a yearly review of the WVPP prior to the annual training of all employees
XXX	Safety Committee Documentation and Records Coordinator	 Provide a copy of the WVPP to all employees Keep copy of electronic master document WVPP Organize and schedule monthly safety meetings, create monthly assignments (or assign designee) Talk with employees about concerns they may have and encourage them to contribute and review the WVPP Ensure workplace hazards are regularly assessed and addressed Complete periodic inspections of the facility to ensure compliance Track employee attendance and completion of the training Track and keep documentation for physical site walkthroughs, needs assessments, and resolutions of incidents

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and answering employee questions about the WVPP.



Employee Active Involvement

The Cathedral School for Boys (CSB) ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan. CSB involves employees and authorized representatives in the identification, evaluation, and correction of workplace violence hazards. This includes obtaining feedback and comments related to training programs, reporting structures and transparency and review of the violence risk assessment and mitigation process. This occurs through conversations with managers and members of the Safety Committee, the solicitation and review of online and pen/paper feedback, participation in site walkthroughs and participation, and review and/or contribution to monthly safety meetings.

To further ensure the required employee involvement and compliance with the WVPP, creating a Safety Committee consisting of key interested employees helps ensure that employees have an accessible and continuous place to bring concerns or new ideas to this work. CSB created this committee to further due diligence and good faith to the state that the WVPP process is being taken seriously and will not exist simply as a plan without accessibility to employees or simply a "check the box" binder in an office. The Safety Committee spreads the work of compliance across several positions to help ensure that the mandate's requirements are met. CSB Safety Committee meets at least monthly and/or after an incident of workplace violence.

The Safety Committee addresses the following areas:

Training

- Create educational programs, implement these programs' key principles, solicit feedback, and review and application of suggested improvements
- Ensure employees understand their role during an emergency
- Communicate with the employees about the plan and solicit their ideas and observations to improve the plan

Reporting

- Ensure accessibility of reporting and advertise the reporting process, focusing on removing obstacles and making the process of sharing observations related to potential risks and violence efficient and efficacious
- Ensure timely reporting of concerns and document the timeline from the initial report to resolution with a focus on transparency and a process that is fair and equitable with consistent aspects to migrate bias and consider cultural differences
- Certify reports are tracked to assess trends better and inform future review and survey processes

Violent Incident Log (VIL)

- Confirm VIL is completed accurately and in compliance with SB 553
- Ensure accessibility of the log to employees and state compliance offices
- Ensure VIL contains no identifying personal or medical information



WVPP Maintenance

- Ensure a process that includes planned quality assurance and assessment of the overall WVPP, including planned reviews and scheduled updates to the existing plan based on new legislation, trends in workplace violence practice, and unique experiences related to CSB practices
- Pursue observations, opinions, and comments from employees and incorporate feedback into the WVPP review and, as appropriate, use this feedback to strengthen the plan

	Task	Operationalization
1	Identifying, evaluating, and determining corrective measures to prevent workplace violence	CSB has created a Safety Committee that will meet monthly to coordinate with employees, discuss the identification of workplace violence- related concerns/hazards, evaluate those hazards and/or concerns, and identify how to correct them.
2	Designing and implementing training	Through the established Safety Committee, employees will have opportunities to assist in developing training related to workplace violence prevention topics. Feedback will be solicited during training sessions to improve existing programs. The training plan will be overseen by the Training Coordinator and is outlined in <u>Appendix F</u> .
3	Reporting and investigating workplace violence incidents	Employees will be able to make reports through the concern form outlined in <u>Appendix B</u> , submitting through an anonymous portal, or talking directly to a supervisor. This process is overseen by the Safety Committee Director. Members of the Safety Committee solicit employee input into this process.
4	Ensuring that all workplace violence policies and procedures within this written plan are communicated and understood by all employees	As part of the overall training plan, the Training Coordinator will ensure all employees have a copy of the plan and will solicit feedback.
5	Enforcing the rules fairly and uniformly	The Safety Committee Director will meet with supervisors and managers, with the support of the WVPP Responsible Person, to ensure the plan is established, implemented, and maintained fairly and uniformly.
6	Ensuring that employees follow all workplace violence prevention plan directives, policies, and procedures	The Coordinator of Training, with support from the Safety Committee, will ensure the successful implementation of the plan. The



	and assist in maintaining a safe work environment	Coordinator of Training will develop and implement an employee survey to identify any new areas of concern and ensure plan directives and policies are working as intended.
7	Ensuring the plan is always in effect in all work areas and is specific to the hazards and corrective measures for each work area and operation	The Safety Committee will ensure the plan is in full effect and solicit feedback from employees to identify any new concerns or aspects of the plan that need to be updated to improve responses to any specific needs that arise.



Employee Compliance

CSB has built a procedural process with effective procedures in place to ensure supervisory and nonsupervisory employees comply with the WVPP. CSB is committed to recognizing employees who follow safe and healthy workplace practices, attend trainings, and share concerns through the Safety Committee, a written concern form, or online submission. The company further acknowledges that employees who do not follow the WVPP or attend required trainings may be subject to disciplinary action, up to and including termination. CSB acknowledges that the lack of employee compliance with the plan could result in the company receiving a notice of a civil penalty or issuance of a citation.

Administration and managers of others are responsible for ensuring that all safety and health policies and procedures related to workplace violence prevention are clearly communicated and understood by all employees. All employees are responsible for using safe work practices, following all directives, policies, and procedures to assist in maintaining a safe work environment and promoting safety whenever and wherever possible. Managers are trained, and retrained as appropriate, on the WVPP. Managers are expected to enforce the rules and expectations fairly, uniformly, and without retaliation.

To ensure employees comply with the rules and work practices that are designed to make the workplace more secure and do not engage in threats or physical actions that create a security hazard for others in the workplace, the WVPP includes, at a minimum:

- Training for employees, supervisors, and managers on CSB's Workplace Violence Prevention Plan (WVPP) provisions. This is coordinated through the Safety Committee, with the scheduling and establishment of training occurring through the Coordinator of Training. The documentation and records coordinator will keep records of employees completing the training and their attendance.
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP. This is accomplished through direct supervision and training conducted by the Safety Committee Director with support from the Training Coordinator.
- Retraining for employees whose safety performance is deficient with the WVPP. The Safety Committee Director will initiate this process, which will be supported by the staff member's supervisor. When safety performance concerns are identified, the Training Coordinator will assist in developing, implementing, and monitoring these additional training goals.
- Employees who demonstrate safe work practices that promote the WVPP in the workplace should be recognized by the Safety Committee Director and the WVPP Responsible Person. This will occur through a company email and/or memo, notation in the employees' human resources file, and other accolades such as a certificate of recognition from the owner/upper management of CSB
- Discipline procedures for employees who fail to comply with the WVPP, which may result in discipline following CSB's progressive discipline policy.



Communication with Employees

CSB is committed to two-way communication between management, supervisors, staff, and employees to create a safe workplace free of threats of violence, whether between employees, external sources, or with the public. This commitment to communication serves to share expectations clearly and understandably, allow for conversations and growth in the communication process, and prioritize a safe and productive environment.

CSB recognizes that to maintain a safe and secure work environment, it must maintain communication on workplace violence with all employees, including the employees of other employers who work on campus. The following communication system is designed to facilitate a continuous flow safety, health, and security information in a form that is readily understandable to and between all affected site personnel and maintained free from fear of reprisal.

- Direct communication from the Safety Committee to employees concerning training development, reporting concerns, and soliciting ideas to improve the WVPP process, and a commitment to improving communication through a growth mindset informed process.
- Monthly Safety Committee meetings to discuss concerns and current trends, review feedback, and ensure existing procedures are in good order and achieve the desired results. This includes reviewing training materials and schedule and ensuring any materials (posted or as part of training) are offered in a manner that is accessible to all employees (e.g., addressing language differences and technology availability and proficiency).
- The Safety Committee will share quarterly updates on aspects of the WVPP, including upcoming training, informational flyers and educational materials, statistics, and trends related to workplace violence on the national, state, and company levels. This includes updates on previous incidents and sharing how employees can access Violent Incident Logs (VIL). These quarterly updates will be interactive and allow employees to ask questions and raise concerns. The purpose of these meetings is to ensure a coordinated response to incidents, reduce the siloing of information that could harm future prevention of workplace violence incidents, and ensure employees understand their perspective roles as outlined in the WVPP.
- As discussed in more detail in the section, "<u>Reporting Initial Concerns</u>," CSB encourages sharing concerns related to a violent incident, threat, or other concern through various options to allow employees a diversity of choices. These include sharing directly with a supervisor, completing an anonymous pen/paper form, or an online form (that can be submitted anonymously). The Training Coordinator and Safety Committee will provide training for all employees on how to use the Concern Form presented in <u>Appendix B</u>.
- Employees can access their mobile and other communication devices to seek emergency assistance, communicate with a person to determine their safety, or more fully assess the safety risks of a particular circumstance.
- The Safety Director and any supervisory designee will investigate concerns promptly and appropriately inform those involved in the investigation details about the process and explanation of any corrective actions.
- Employees understand their role in the plan.



Reporting Initial Concerns

CSB has implemented an effective, timely, and diverse reporting process regarding how information is shared and kept. While some of the reports related to potential violence risk will come from observations and walkthroughs of your facilities, equally important are reports shared by school employees.

To ensure an effective reporting process, CSB outlines common areas of concern that employees should report forward in <u>Appendix B</u>. An online version of this form can be completed at <u>https://www.wvpa.org/concern</u>. At CSB, employees have a clear voice in the process and can share concerns without fear of retaliation, reprisal, or other negative community impacts.

The following core principles are included as guidelines to inform the reporting process.

- All threats, acts of workplace violence, hazards, and workplace violence concerns are reported to an employee's supervisor or manager, who will inform the Safety Committee.
- The Safety Committee will communicate with new hires about how, what, and when to report through quarterly safety meetings and scheduled employee trainings.
- Reporting options include multiple languages and methods to ensure all employees are comfortable sharing concerns without fear of retaliation. No pressure or limits will be placed on employees to discourage them from using the formal report process or redirect them to only make reports internally to supervisors. The reporting process allows for anonymous reporting.
- Employees are trained and encouraged to report concerns early and often, as sharing a concern should not be viewed as part of a punitive process
- The Safety Committee and CSB leadership shall educate and lead by example related to growth-oriented culture, using reports for improvement rather than punishment.
- The reporting process is not overly time-consuming or complicated. The concern form is designed to take 5-7 minutes to complete in pen/paper format or through the online form.
- The Safety Committee and leadership of CSB will reassure the reporter that their physical protection and freedom from retaliation are a priority in the process. Any instances of retaliation are dealt with swiftly and decisively. An employee who retaliates against a coworker for reporting an incident could be disciplined or terminated.
- CSB prioritizes a transparent reporting process that encourages sharing lower-level concerns to help demonstrate that all reports do not lead to separation or severe consequences. The Safety Committee trains and educates employees that sharing concerns about community safety is part of their shared responsibility.
- All employees will have access to their records, the Violent Incident Log, and the written WVPP. As the VIL will also be available to the state, any identifying or medical information must be removed. Employee requests for the VIL must be met within fifteen days, and no cost will be charged to the employee. Employees requesting other records, such as a detailed incident account, should follow existing human resources record request procedures.



The following risk factors may be useful to consider when training and talking with employees about areas to consider filling out a Concern Report related to targeted violence.

Environmental Factors		
Job or academic status loss	Disciplinary/conduct/HR action	
Decline in work performance	Lack of access to healthcare	
Access to lethal weapons	Victim of bullying/teasing	
Removed from committee	Death of a pet or loved one	
Lack of family support	Persecuted by others	
Evaporating social inhibitors	End of a relationship	
Loss of housing or apartment	Extreme financial stress	
Lack of peer support	Lack of anger outlets	
Overwhelming stress	Other catalyst events	

Cognitive Factors		
Feels owed or entitled	Hardened, inflexible thoughts	
Fantasizing about death	Oppositional thoughts	
Harboring violent fantasies	Explosive tantrum	
Injustice/grievance collecting	Polarized, extreme thoughts	
Developing attack plan	Driven toward violent action	
Lack of empathy or remorse	Hopelessness or lack of options	
Glorification of violence	Desire for fame	

Behavioral Indicators		
Acquiring weapons Intimidates others	Direct threat Self-injury (suicidal or non)	
Fixation on target group	Leakage about the attack plan	
Creation of legacy token	Counter-surveillance actions	
Medication non-compliance	Unable to take responsibility	
Serious mental illness	Explosive reactions/tantrums	
Poor frustration tolerance	Vague or indirect threat	
Sharing an attack plan	Focus on target	



Leakage about attack location	Violent drawings or writings
Last-act behaviors	Overly defensive/aggressive
Studying past attacks	Drastic behavior change
Substance abuse	Lacking impulse control
Suicide attempt	Giving away prized possessions
Conflict with authority	Leakage about attack time
Studying target	Objectification of others
Lack of remorse when caught	Erratic or risk-taking behavior



Emergency Response Procedures

CSB trains and educates its employees through all-hazard response training for responding to an emergency. This training offers practical and easy-to-understand guidance when responding to fire, flood, hazmat spills, active assailants/shooters, suspicious packages, earthquakes, and weather emergencies. All-hazard response training provides a short list of options for each of the significant hazards experienced in the workplace. This type of training helps prepare employees facing any potential workplace violence to know what they should do. As with any training, the all-hazard approach is most effective when repeated and practiced by those using it.

The training is given in conjunction with the development of emergency flipbooks. This flipbook provides an easy-to-follow set of key concepts and suggested actions to improve response time, save lives, and ensure good communication. The flipbook is a triage tool and, as such, will not contain everything a person needs to know about each critical incident. This includes interacting with law enforcement and each employee understanding their role in a critical incident. Flipbooks are given to every employee and posted in each classroom and all common areas, such as the cafeteria and main lobby. These flipbooks should be printed rather than digital and made from a material that allows those using them in an emergency to take notes about what has happened and their actions. CSB coordinates the following through the Safety Committee based on the all-hazard response course:

- An intercom system through the phones, duress/panic alarm at the front desk, and emergency alert system on the desktop computers that allows assigned personnel to alert employees to the presence, location, and nature of workplace violence emergencies.
- Defined evacuation procedures that include identified rally, refuge, and reunification points following a critical incident.
- Defined terms to include lockdown/barricade, shelter-in-place, safer corner, concealment vs. cover, staging area, Mass Casualty Incident (MCI), NIMS/ICS, and Unified Command
- A flipbook is provided to each employee and easily available in each room of the facility. These flipbooks assist with documentation, allow for quick and easy access during an emergency, and aid with the memory of what to do in each of the critical incidents listed.
- Medical training through the Safety Committee for emergencies to include Stop-the-Bleed training, wound packing, CPR/basic first aid, and Automated External Deliberator (AED) usage

A checklist helps move resources quickly and efficiently to where they are needed. In a crisis, no magic box of resources drops from the sky. A medical response must coordinate who is taken to trauma facilities via life flight and ambulance and ensure the hospitals can care for them. Similarly, city employees will need to check critical infrastructure such as gas, electric, and sewer lines. The sooner these resources are requested, the faster they will be where we need them. The following offer several points of advice regarding an emergency response.

Please refer to the Comprehensive School Safety Plan for additional Lockdown and Secure School procedures.



When responding to a medical emergency:

- Call 911
- Assess scene safety
- Locate and isolate threat/danger
- Evacuate if needed
- MCI process and/or mutual aid request
- Establish staging and MCI area
- Send a person to meet/direct EMS
- Establish a staging area

When responding to a security threat:

- Call 911
- Evacuate those in line of site
- Establish a command post
- Advise all to the location of danger with lockdown/barricade, shelter-in-place, run-hidefight
- Establish a perimeter for public
- Develop a check-in/out process
- Establish a reunification site
- Increased security

Documentation considerations during a critical incident:

- Create a log for the event
- Scene photos before the incident
- Begin damage estimation forms
- Begin workman's comp forms
- Initial injury forms
- Remind staff to write down times

After-event:

- Make counseling support available
- Follow up person for neighbors
- Clean-up process
- Use community/religious support
- Develop a "return to normal" plan
- Communicate repair schedule

Additional resources following a critical incident:

- Establish/expand communications plan
- Start crisis media plan
- Call custodial, physical plant staff
- Call admin, HQ, and off-duty staff
- Call outside contractors/consult
- Activate EAP, therapeutic support services
- Identify community and religious supports; Red Cross
- Traffic control and parking



Workplace Hazard Identification

CSB addresses workplace hazard identification through several processes. These include a physical review of the space, encouraging employees to identify and share concerns they see in their day-to-day work, and a review of these points of data by the Safety Committee to identify immediate needs, trending concerns, and updates in state and federal best practices.

Annual Physical Walkthrough (TVRA/CPTED)

Facility inspections occur when the plan is first established, annually thereafter, and after each workplace violence incident. An inspection should also occur if the employer or Safety Committee is made aware of any new or previously unrecognized threats or hazards and whenever workplace security or safety conditions warrant a review. An overview checklist of TVRA/CPTED questions is included in <u>Appendix E</u>. This physical safety walkthrough report is kept in the Comprehensive School Safety Plan Document

Examples of areas that are reviewed during these annual walkthroughs include:

Clear signage and building identification. It is critical to help first responders find the location of the emergency quickly. This means having signs on all sides of each building, exterior windows, and large signage for rooms like the main office, factory floor, break rooms, product storage, and sales. If a room has multiple purposes, agree upon a single name to use when directing outsiders and first responders to prevent confusion and have the signage reflect that. In addition to building letters and names, there should be wayfinding signage to show in which direction other buildings or offices are located. Ensure employees have taken the time to learn and use ordinal directions within the site (north, south, east, and west) to direct first responders where they need to go.

Master keys availability. Make sure to have master keys available for first responders. Many businesses use a key box for firefighters (commonly called a Knox box), but police do not always have access to this. Giving a set of master keys to the police department allows them access to your business in an emergency. These should also be issued to all staff and substitutes to lockdown/barricade when needed. Ideally, move from keys to key card access, as this dramatically reduces the costs of chaining or resetting keys.

Ensure a timely response to work orders. Safety work orders need to be expedited when related to a risk of entry or the lockdown/barricade process. Ensure all employees understand how to submit these requests. When they are submitted, ensure the repairs are completed quickly. Communicate with employees about the repairs, including when and why there might be a delay.

Lock doors. Securing all doors is the best way to prevent an attack from reaching high casualty numbers. In the history of workplace and school violence, very few attackers gained entry through a locked door. Keep your classroom, hallways, meeting rooms, motor vehicles, and office doors secured. Make master keys or electronic key fobs available to supervisors or managers. Address ways employees regularly leave areas open, such as using a door wedge or allowing people to enter without checking their ID. A single public



point of entry is ideal whenever possible. When multiple exits are required for fire codes or evacuations, keep them locked, allowing them to be used only for exiting.

Cover windows and turn off lights. In an active assailant scenario, one of the critical elements of a response is reducing the attacker's ability to identify and acquire targets. Ensuring that windows can be covered and lights turned off helps improve employees' ability to hide. The less you must accomplish under stress, the better. Ideally, windows should have shades or curtains that can be drawn in an emergency. The more ways we limit an attacker's senses, the harder it is for them to acquire a target. Turning off lights and covering windows make it more difficult for the attacker to see their target, much like keeping quiet reduces an attacker's ability to listen for and find a target.

Maintain a schematic of the school. In conjunction with building identification, each site should maintain an up-to-date blueprint of the grounds that marks all buildings, including temporary structures, such as storage units, and all utilities, such as HVAC, internet, water, and power. The site facility supervisor should review and update the blueprint annually and note any changes. Include a copy of the current blueprint in each WVPP. Note the locations of all emergency shutoff valves in each blueprint, as these may be needed in an earthquake, fire, or other natural disaster.

Use safer corners symbols and training. During a lockdown/barricade, everyone in the workplace should move quickly to a safer corner, which is the area of the room least visible from doors and windows and thus safest from an intruder. This keeps the employees outside the line of fire. Training employees on where to go during a lockdown/barricade event is essential. We suggest marking safer corners with visible signs like a large star. When areas are being set up or rearranged, ensure the safer corner is available. Use a safer corner symbol in every room to mark the area when possible.

Consider emergency items storage, maintenance, and retrieval. Having a clear plan for where items are stored is equally as critical as obtaining them when needed. This includes maintaining a secure storage location for items you keep ready for deployment in an emergency and having plans to retrieve and deploy these items during an emergency or disaster. Critical items should be kept in a secure designated location away from primary structures. Ensure your storage location is safe and secure, including storing fuel apart from food, keeping perishable items in a cool, dry area, and protecting food from animals and scavengers.

Improve line of sight and natural surveillance. This allows you to see dangers approaching and causes bad actors to ask themselves, "Who is watching me?" and "Can I be seen here?" This helps deter bad actors seeking to gain access to cause harm. This involves keeping shrubs, trees, and other vegetation trimmed and well-maintained to allow a clear line of sight and ensuring that you have adequate lighting inside and outside the building. A well-cared-for space fosters a sense of pride and social cohesion that discourages such activities.



Review of Submitted Concerns

As employees submit concerns, the Safety Committee will review them daily and during their monthly meetings. These reports will come from both named and anonymous individuals and via pen/paper reports and online submissions. Concerns can also be submitted through a hotline or via text message.

Periodic Physical Inspections

The Safety Committee will conduct quarterly assessments to augment the annual assessments to identify potentially unsafe conditions and potential risks and threats to employee safety. <u>Appendix</u> \underline{E} provides a more detailed checklist for these processes. As mentioned, the Comprehensive School Safety Plan includes a copy of the most recent CPTED/TVRA physical site inspection.

System and Policy Review

In addition to physical security assessments, CSB encourages a periodic review of staff knowledge and training experience related to potential escalations in workplace violence. While many of these questions are outlined through existing training and memorialized in the WVPP, a member of the Safety Committee reviewing these practices helps reduce violence risk.

- 1. Do employees know how to call for police, fire, and medical services?
- 2. Do employees understand their roles during critical incidents via all-hazard training and emergency flipcharts?
- 3. Do employees clearly understand how to interact with police during a critical incident?
- 4. Do employees understand terms such as lockdown/barricade and shelter-in-place?
- 5. Are there clear expectations for employees about what kinds of suspicious or concerning behaviors they should complete a concern form on?
- 6. Do employees know the limits and scope of their actions when it comes to interacting with hostile members of the public or other employees who have a real risk of becoming physically aggressive?
- 7. Are there any concerning trends in hostile or angry conversations among employees that have the potential to escalate?
- 8. Have there been previous arguments and potential escalations that have occurred among employees?
- 9. Are insurance records up to date and reflective of current work?



Workplace Violence Hazard Correction

Once a workplace hazard is identified, efforts should be taken to mitigate the risk related to the hazard in a timely manner. As a hazard is reported or identified, the Safety Committee Director will review the hazard and decide and implement the following steps.

Imminent Workplace Hazard: If the nature of an identified hazard poses a continued threat of danger to an employee or employees, steps should be taken immediately to remove workers from that environment. These identified hazards could include direct verbal threats by an employee or a previous employee, spouse, or other. This involves identifying the directly involved workers and explaining to them why their removal is necessary and what additional protection may be needed. All corrective actions will be documented and kept on file by the Documentation and Record Coordinator. These actions will also be directed to the impacted work area rather than a companywide response.

Other Hazards: For hazards that do not impose an immediate threat of violence, the Safety Committee will review the hazard within two working days and develop a plan to correct it within 5-10 business days. The timeline will be shortened if the nature of the threat, unsafe work practices, or unhealthy conditions requires it. The Documentation and Record Coordinator will document and keep all corrective actions on file. Any corrective actions should be designed to address the concerns in a specific area of the workplace.

Identified Hazard	Corrective Action
Exposure risk for crime at night	 Install exterior lighting to increase visibility Hire nighttime security guards to parole the area Coordinate with local police to increase patrols Verify exterior camera can operate at night
Employees unaware of WVPP	 Ensure each employee has access to the plan Verify each employee has attended the training and has access to the various reporting structures Create incentives for those complying with WVPP
Incident Communications	 Install a loudspeaker, intercom, or other way to notify employees and give instructions during a crisis Identify additional alert/panic button systems that are cost-effective approaches to reduce violence risk
Lack of Medical Support	 Review current medical supplies on-site and create an inventory of what is needed Schedule basic first aid, CPR, and Stop-the-Bleed training programs for all employees Appoint an employee (ideally a member of the Safety Committee) to obtain certification in train-the-trainer courses to be able to train all employees

Examples of these corrective actions could include a variety of physical and human resourcesinformed actions. Some examples of corrective actions include:



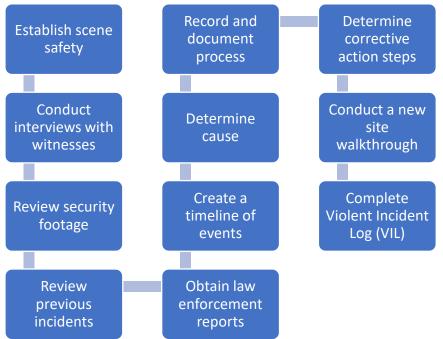
Procedures for Post-Incident Response and Correction

Following a critical incident related to workplace violence, the WVPP Responsible Person and the Safety Committee Director will ensure steps are in place to address security and safety concerns immediately after an incident. This involves visiting the scene when it is safe, conducting interviews with employees, witnesses, and law enforcement, and reviewing security footage that may be available. An assessment of the workplace area for additional safety and security concerns should also be conducted, as should a review of previous incidents with those involved.

After reviewing this information, the Safety Committee Director will create a timeline and outline the escalation of events and the motivations of those involved. Reports from law enforcement should also be obtained to assist with the creation of the timeline. Where possible, the cause of the event will be determined. The Safety Committee Director and their designee will record and document these results.

Corrective actions will be taken to prevent future violence and will be documented by the Safety Committee. A site walkthrough will be conducted following previously referenced TVRA and CPTED procedures, as outlined in the section "<u>Workplace Hazard Identification</u>." Once the entire process is complete, a Violent Incident Log (<u>Appendix C</u>) will be completed for every workplace violence incident. This process is outlined in a later section entitled "<u>Creation of the Violent Incident Log</u>."

The following flow chart provides a general approach to the process described above.



As each incident of workplace violence is unique, there is no set list of questions that can be used to fit each scenario. When conducting these kinds of reviews, a clear template helps mitigate bias

in the process. It is unlikely the bias would be intentional, but having a fixed set of questions and areas to review can ensure critical areas needing review are not skipped through a more subjective process.

The following questions are intended to help outline the existing process.

Goal	Sample Questions
Response time	How quickly did emergency staff (police, fire, ambulance, and first responders) arrive?
Quality of response	Did the right services get to the right people in the right place?
Communication	Did communication devices like two-way radios, alarms/ lights, and loudspeakers work correctly?
Evacuation/rally point	Was there an effective evacuation and gathering at one of the multiple rally points?
ICS/NIMS	Did supervisors and managers communicate in the language of the emergency responders?
Supplies	Were sufficient medical, logistic, and safety supplies available for the incident?
Incorporate past lessons	Were lessons from past incidents applied to improve the response to this incident?
Documentation	Was there adequate documentation during the event to construct a timeline for the response?



Training and Instruction

Training employees on critical elements of the WVPP is central to the compliance process for SB 553. There are both explicit training requirements and recommended trainings that support various elements of the WVPP. All training will be offered with the vocabulary at all employees' educational level, literacy, and language. Training shall be provided to all new employees and other employees for whom training has not previously been provided. It shall also be provided to all employees, supervisors, and managers given new positions.

Essential Training for SB 553 Compliance

General Training on WVPP is offered when the WVPP is first established and annually to ensure all employees understand and follow the plan. This training is completed as part of a new hire onboarding process and will occur when a new or previously unrecognized workplace violence hazard has been identified, resulting in changes in the plan.

This training includes:

- How to obtain a copy of this plan at no cost.
- How to participate in the Safety Committee as they develop elements of the plan and training topics and oversee the implementation of the plan.
- How to share concerns related to workplace violence without fear of reprisal.
- Workplace violence hazards and risks related to their specific jobs, and any corrective measures CSB has implemented.
- How to prevent or respond to the four types of violence
- How to obtain copies of the violent incident log.
- Definitions related to workplace violence (<u>Appendix A</u>).

Recommended Training for SB 553 Compliance for All Employees

Conflict Resolution: Training in conflict resolution is useful for all employees to understand the underlying concepts and increase alignment with the company goals and management. Employees may find themselves in arguments or conflicts with other employees or supervisors. They may be in a direct customer service position where the training would be useful in working with the public and customers. Having a basic understanding of conflict resolution and crisis deescalation should be part of a larger WVPP. Both the counseling and law enforcement fields have important insights in calming the escalation of affective violence, including verbal judo and motivational interviewing techniques. Training should provide participants with evidence-based techniques to address the early conflict, frustrations, and differences that lead to an escalation in physical violence.

All-Hazard Emergency Response: An all-hazard emergency response training offers practical and easy-to-understand guidance when responding to fire, flood, hazmat spills, active assailants/shooters, suspicious packages, earthquakes, and weather emergencies. The training is



designed to be given in conjunction with the emergency flipbook as part of an all-hazard response plan. The training is divided into three major categories: weather emergencies, manmade disasters, and criminal events. *Weather emergencies* and natural disasters include flooding, earthquakes, tornadoes, hurricanes, ice storms, and wildfires. *Manmade disasters* are primarily emergencies caused by accidents or intentionally, like hazardous material spills and dangerous crowd events. Also included here are technological hazards, like transportation system failures and dam failures. Floods or fires might also result from manmade processes or choices. *Criminal events* include mass shootings, cyber-attacks, bomb threats, and suspicious packages. While these can be terrifying events, you are many times more likely to be struck by lightning than involved in a mass shooting. Bomb threats very rarely involve an actual device. Yet, in both cases, knowing how to respond prior to the event will help you move more quickly and safely.

Situational awareness (SA): This training allows us to more quickly respond to crisis events by reducing the time it takes to react to a potential threat. In the simplest terms, SA means attending to what is happening around you to improve your reaction time and take steps to reduce threats and improve your safety. By paying closer attention to the things happening around you, you can more quickly assess the level of risk and take action to avoid danger. Situational awareness is a valuable life skill that all employees can use to improve their safety at work and at home. The earlier we identify a risk or danger, the more time we must react. Supervisors and managers benefit from this knowledge for their own personal and professional safety and preparedness, identifying problems before they occur. These skills can be passed on to family, friends, and community members.

Active Assistant Program: The Mindset active assailant prevention and response training blends the leading research in psychology, law enforcement, and military theory with our instructor's practice and experience to emphasize early preparation prior to an attack. Mindset focuses on increasing awareness of your surroundings. This awareness improves reaction time and empowers community members to act rather than becoming frozen by fear or indecision. Mindset helps participants choose the best course of action, leading to a better chance of survival. The program focuses on building habits and muscle memory that will help you respond quickly to threats and dangers. We do this in a trauma-informed practice, which means we consider the past experiences of those we train and design our material to remove obstacles to their understanding and retention of the material.

Bystander Empowerment: A bystander empowerment and intervention program must be in place at every level of the company to ensure consistency, genuineness, and authenticity in the approach. The plan will not be as successful if bystander intervention is focused only on front-line employees and is not practiced among supervisors, managers, and upper-level management. Programming should be offered to all employees, and company leadership should demonstrate and encourage the practice of bystander empowerment to ensure it remains free of retaliation.

Ensuring Worker Wellness: Employee safety includes identifying and managing excessive stress and potential burnout. Overwhelmed, distracted, and exhausted employees directly impact productivity and increase the risks of mistakes and injuries while on the job. Workers with poor mental health and well-being are unlikely to focus on any of the training offered to them and will also be unlikely to pay attention to safety concerns and take the time to complete reports. This program is useful for all employees, from front-line employees to business owners and other



leaders. Understanding the role of stress and how it impacts performance and compliance with the WVPP is an important way to ensure the plan is effective over time. Training is most effective when aimed at specific groups, allowing for tailored examples of stress and challenges in different work roles and positions. Conflicts between co-workers in a retail space present a different kind of stress than managers and supervisors being tasked to streamline expenses and budgets. While each group may feel the negative impact of stress in the workplace, how it manifests may differ depending on the job responsibilities.

Recommended Training for SB 553 Compliance for Management

Critical Incident Response: Critical incident response training is useful for anyone working with law enforcement, EMS, or fire departments during an emergency. Awareness of the system they use to communicate and divide the various tasks and responsibilities in a crisis is useful for company leaders. Critical incidents include any crisis or disaster that impacts a business, from weather-related emergencies to active shooters. This includes fires, earthquakes, hazmat spills, and any other emergencies that require someone from the company to take control of the initial response, manage the scene, and work with the media. Some emergencies last for days, weeks, and months; others are short-term. Critical incident response training draws from principles of incident command system (ICS), crisis communication, and coordinated response. It brings together vital concepts from law enforcement, emergency response, psychology, and an all-hazard approach.

Crisis Communication: Crisis communication often means different things to different people. To a public information officer (PIO), crisis communication involves responding to the press and leading press conferences. To business owners, it can mean sharing messages with employees in a professional and informative manner. To supervisors, it can mean talking about performance issues and annual performance reviews. To human resources, it may mean managing a PIP or discussing hiring/firing decisions and implementations. The connective thread in these applications of crisis communication is the high-stakes nature of the conversations and information being shared. Crisis communication is often put under the microscope, and mistakes either go viral on social media or cause intense emotional reactions from the person(s) receiving the message. Whatever your position in the company, being aware of the foundational principles of crisis communication will help you be more effective and avoid common pitfalls and traps. Supervisors and managers benefit from training with a focus on how to have intense, emotional, and difficult conversations with those under their direction, such as discussing work performance issues, responding to requests for time off, discussing medical concerns that impact work, suspending or terminating employees, or establishing a performance improvement plan (PIP). Understanding how to engage in these conversations calmly, provide clear and authentic messaging, and handle escalating behaviors from the employee or staff will help with an overall reduction in potential violence in the workplace



Employee Access to the WVPP

All CSB employees have access to the WVPP at no cost. Any employee requesting a copy of the written WVPP will receive a printed copy (unless they prefer an electronic one). Copies of the plan will be shared with employees during the annual WVPP general training. Requests to have the plan available in a language other than English will also be granted without cost. A copy of this WVPP is also available and accessible to employees electronically on MyCSB.

Record Keeping

Keeping accurate records is a central tenet of compliance with SB 553. CSB keeps records through human resources and the Safety Committee for a minimum of five (5) years. This includes workplace hazard identification, evaluation, and corrective actions. The Coordinator of Records and Documentation ensures these records are kept in compliance with SB 553 Standards. All records shall be made available to Cal/OSHA upon request for examination and copying.

Training records are kept for a minimum of one (1) year and include the training date, a PDF of the slide content, the name and qualifications of the person conducting the training, and the names and job titles of all persons attending the training sessions.

Violent Incident Logs are kept for a minimum of five years and are shared with the State of California in compliance with SB 553.

Workplace violence incident investigation documentation will be kept for a minimum of five (5) years and contain no medical information

Employee Access to Records

Employees of CSB may have access to the following records upon request and without cost within 15 calendar days of a request: training documentation, Violent Incident Log(s), and records of workplace violence hazard identification, evaluation, and correction.

Review and Revisions of the WVPP

This WVPP will be reviewed annually or when a previously unrecognized workplace hazard is identified. It will also be reviewed as needed and after an incident of workplace violence. The Safety Committee Director will coordinate these reviews. Updates and reviews of the WVPP should specifically include changes to any procedures, updates to names and positions listed in the WVPP, and suggestions for new training classes/materials to match the unique risks facing CSB.

Employees will be actively involved in this review by submitting feedback, comments during training, and conversations with supervisors or members of the Safety Committee. This includes reviews of incident investigations and the violent incident log(s). Reviews should include physical walkthroughs, the VIL, and an assessment of WVPP implantation and effectiveness as outlined in the previous section, "Procedures for Post-Incident Response and Correction"



Creation of the Violent Incident Log

California SB 553 mandates the creation and storage of a Violent Incident Log (VIL). The VIL includes any hazard identification, evaluation, and correction and shall be maintained for a minimum of five years.

CSB acknowledges the VIL (<u>Appendix C</u>) is separate from the Concern Form (<u>Appendix B</u>), and the Safety Committee Director will be the person creating the VIL. In these early stages of assessing compliance mandates, CSB gathers a complete and accurate collection of all information needed to investigate the incident, process what has occurred, and manage the outcome. From this data, a VIL should be created to document the incident outcome, with an awareness that the VIL will be viewable by the public. To that end, the VIL narrative section should be an area of particular focus, ensuring that language is clear, at the required developmental level, and free of negative accusations or company jargon/abbreviations.

No personal identifying information is recorded or documented in VIL. This includes information that would reveal the identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.



Appendix A: Definition of Terms

"Affective violence" is impulsive, poorly planned, and reactive to a situation that occurs. This violence is escalated by biological changes such as a rapid heartbeat, blood pooling in the center torso, and the release of adrenaline. This reactive violence occurs when a person raises their voice and threatens others around them, pumping themselves up and down to escalate.

"Emergency" means unanticipated circumstances that can be life-threatening or pose a risk of significant injuries to employees or other persons.

"Engineering controls" mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.

"Log" means the Violent Incident Log required by this section. The employer shall record information in a violent incident log for every workplace violence incident. Information that is recorded in the log for each incident shall be based on information solicited from the employees who experienced the workplace violence, witness statements, and investigation findings. The employer shall omit any element of personal identifying information sufficient to allow identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

"Plan" means the workplace violence prevention plan required by this section.

Predatory (or targeted) violence requires forethought, planning, and focus on completing a mission or objective. The violence involves developing strategies, tactics, and logistics.

"Safety Committee" is a group created at CSB to better assign responsibilities and ensure compliance with SB 553 expectations of the WVPP

"Safety Committee Director" is the chair of the Safety Committee and reports directly to the WVPP Responsible Person to ensure compliance with all elements of the plan.

The "Safety Committee Training Coordinator" assists with coordinating the training calendar, reviewing feedback following the training, and enlisting employee ideas for improvement and observations related to workplace safety.

The "Safety Committee Documentation and Records Coordinator" coordinates with the Training Coordinator and Safety Committee Director to track attendance and compliance aspects of the plan.

"Substantive threats" are not always communicated as clearly and are supported by access to weapons or lethal means and driven more by a desire to harm or destroy a target.

"Threat of violence" means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.



"Transient threats" have a lower likelihood of being carried out when compared to substantive threats. They are often an emotional reaction to a stressful situation in which the person making the threat feels trapped, misunderstood, angry, or unheard.

"Workplace violence" means any act of violence or threat of violence that occurs in a place of employment.

"Workplace violence" includes, but is not limited to, the following:

The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.

An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

The following four workplace violence types:

"Type 1 violence," which means workplace violence 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," which means workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

"Type 3 violence," which means workplace violence against an employee by a present or former employee, supervisor, or manager.

"Type 4 violence," which means workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.

"Workplace violence" does not include lawful acts of self-defense or defense of others.

"Work practice controls" means procedures and rules that are used to effectively reduce workplace violence hazards.



Appendix B: Concern Form

Date and time of incident:

Location: _____

Facility Safety Concern:

Please provide a detailed description of the concern.

Behavioral Safety Concern:

Those involved (please provide full names when possible):

Please check any behaviors that concern you about the situation, employee, or person(s) involved.

Environmental Circumstances:

- $\hfill\square$ Death of a loved one or pet
- □ Loss of dating or intimate relationship
- □ Removed from shift, activity, or company event
- □ Pending suspension, police charges, or court involvement
- □ Medical trauma or injury
- □ Unsafe use of a machine or other risky, on-site behavior
- □ Involved in bullying or teasing behavior

Financial insecurity:

- □ Food insecurity
- □ Housing insecurity
- \Box Victim of crime or harm

Anger/Aggression:

- □ Disturbing written material or drawings
- □ Threats to hurt another person

- □ Insulting, profane, or aggressive language
- □ Preoccupation or discussion about ammunition or weapons
- □ Showing a weapon or prohibited item at the workplace
- □ Hostility or angry outbursts
- □ Sexual aggression, verbal threat, or physical threat

Concerning Behaviors:

CATHEDRAL

SCHOOL FOR BOYS

- □ Intense sadness, tearfulness, or expressions of dread
- □ Excessive absences from work or during shifts
- □ Extreme withdrawal and social isolation
- □ Ongoing arguments with other employees
- □ Unusual or odd behavior such as talking to self or strange dress/mannerisms
- □ Suicidal remarks, thoughts, or actions
- □ Self-harming or cutting behaviors
- $\hfill\square$ Preoccupation with death and dying
- □ Alcohol or other drug abuse/concern

Please describe the behaviors that have prompted you to share your concerns. Use as much detail as possible, including dates for any specific incidents. If you did not witness the behavior first-hand, please share how you learned of this information.

How long has the behavior been going on?

Have you spoken to or corresponded with anyone about your concern? If yes, who?

Have you told the person that you will be submitting this referral? \Box Yes \Box No

Please share any reports, emails, videos, text messages, or recordings related to the concern.

I understand that referrals from this form will be received during regular business hours (Monday – Friday, 8:00 a.m. – 5:00 p.m.) and are not monitored after hours, on weekends, or during official holidays. I understand that if there is an immediate risk of harm to self or others, I should contact on-site security or the local police before submitting this form.



Completed by (optional):

(Name and job title)

(Signature)

Are you comfortable with us letting those involved know you shared this concern?

 \Box Yes \Box No



Appendix C: Violent Incident Log

Date of incident: _____

Time of incident: _____

Location: _____

Type of violence (choose all that apply):

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- Type 1 violence: workplace violence 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: workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- □ Type 3 violence: workplace violence against an employee by a present or former employee, supervisor, or manager.
- Type 4 violence: workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.

Type of incident (choose one):

- Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
- Attack with a weapon or object, including a firearm, knife, or other object.
- \Box Threat of physical force or threat of the use of a weapon or other object.
- □ Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- □ Animal attack.
- □ Other.:_____



Narrative (describe the incident including a timeline):

Classification of the perpetrator (choose all that apply):

- \Box Client or customer
- □ Family or friend of a client or customer
- □ Stranger with criminal intent
- □ Coworker, supervisor or manager
- □ Partner or spouse
- □ Parent or relative
- Other perpetrator: _____

Circumstances – The employee was (choose all that apply):

- □ Completing usual job duties
- □ Working in poorly lit areas
- □ Rushed
- □ Working during a low staffing level
- \Box Isolated or alone
- \Box Unable to get help or assistance
- □ Working in a community setting
- □ Working in an unfamiliar or new location



Location (such as in the workplace, parking lot or other area outside the workplace, or other area):

Incident outcome:

Emergency response:

Onsite security Police Medical Fire Alerts: Alarm Text messages Supervisor notification Public announcement Other: _____ Today's date: _____ This record will be maintained a minimum of five (5) years from this date. Completed by: (Name and job title)

(Signature)

Appendix D: Compliance Checklist

#	Requirement under SB 553	Status		
GENER	GENERAL REQUIREMENTS			
1	Exceptions for Workplace Violence Prevention Plan (WVPP) (SEC. 4. Section 6401.9, b2 A-F)			
1.1	Health care facilities ¹			
1.2	Department of Corrections facilities ²			
1.3	Law enforcement agencies ³			
1.4	Teleworking employees			
1.5	Less than 10 employees working at a given time and are not accessible to the $\ensuremath{public}\xspace^4$			
2	Core Requirements (SEC. 4. Section 6401.9, c1 A-B)			
2.1	Establish an effective workplace violence prevention plan	Pg 3, 4		
2.2	Implement an effective workplace violence prevention plan	Pg 3, 4		
2.3	Maintain an effective workplace violence prevention plan	Pg 3, 4		
2.4	The WVPP will be operational at all times	Pg 3, 4		
2.5	The WVPP will be operational in all work areas	Pg 3, 4		
2.6	The WVPP will be written	Pg 3, 4		
2.7	Available and easily accessible to employees	Pg 6, 6, 11		
2.8	Be specific to each work area and operation	Pg 9, 20, 23		
2.9	The WVPP shall be operative on and after July 1, 2024	Pg, 3,4		
PLAN C	COMPONENTS			
3	Responsible Person(s) (SEC. 4. Section 6401.9, c1 B, c2 A)			
3.1	Name or job title of the person or persons responsible for implementing the program.	Pg 5, 6		

¹ When covered by <u>Section 3342 of Title 8 of the California Code of Regulations</u>.

² When in compliance with <u>Section 3203 of Title 8 of the California Code of Regulations</u>.

³ As defined in <u>Section 1001 of Title 11 of the California Code of Regulations</u> and that have received confirmation of compliance with the Commission on Peace Officer Standards and Training (POST) Program from the POST Executive Director in accordance with <u>Section 1010 of Title 11 of the California Code of Regulations</u> and if all facilities operated by the agency are in compliance with <u>Section 3203 of Title 8 of the California Code of Regulations</u>.

⁴ Must be in compliance with <u>Section 3203 of Title 8 of the California Code of Regulations</u>.



3.2	If multiple persons, their roles shall be clearly described	Pg 5, 6
	1	I
4	Active Employee Involvement (SEC. 4. Section 6401.9, c1 B, c2 B)	
4.1	Effective procedures to obtain active involvement	Pg 7, 8, 9
4.2	Involvement of employees and authorized employee representatives in developing and implementing the WVPPP	Pg 7, 8, 9
4.3	In identifying, evaluating, and correcting workplace violence hazards	Pg 7, 8, 9
4.4	In designing and implementing training	Pg 7, 8, 9, 26
4.5	In reporting and investigating workplace violence incidents	Pg 7, 8, 9
5	Coordination with Other Employers (SEC. 4. Section 6401.9, c1 B, c2 C)	
5.1	Methods the employer will use to coordinate implementation of the plan with other employers	Pg 7, 8, 9
5.2	Employers and employees understand their respective roles as outlined in plan	Pg 7, 8, 9, 11
5.3	Employees are provided required training (outlined in #19)	Pg 7, 13, 23
5.4	Workplace violence incidents involving any employee are reported, investigated, and recorded	Pg, 11-14
6	Reporting (SEC. 4. Section 6401.9, c1 B, c2 D)	
6.1	Effective procedures for the employer to accept and respond to reports	Pg 12-22
6.2	Prohibit retaliation against an employee who makes such a report.	Pg 4, 2
7	Employee Compliance with the Plan (SEC. 4. Section 6401.9, c1 B, c2 E)	
7.1	Effective procedures to ensure that supervisory and nonsupervisory employees comply with the plan	Pg 4, 5, 10
7.2	Recognition of employees who follow safe and healthful work practices, training and retraining programs, and disciplinary actions	Pg 10
7.3	Enforcement can result in issuance of a citation and notice of civil penalty	Pg 10
8	Communication with Employees (SEC. 4. Section 6401.9, c1 B, c2 F)	
8.1	Effective procedures to communicate with employees regarding workplace violence matters	Pg 11



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8.2	How to report a violent incident, threat, or other workplace violence concern to the employer or law enforcement	Pg 12-14
8.3	How to report without fear of reprisal	Pg 10, 12-14
8.4	How employee concerns will be investigated	Pg 21, 22
8.5	How employees will be informed of the results of the investigation	Pg 11, 21, 22
8.6	Any corrective actions to be taken as part of the employer's Pg 20- responsibility, including correcting workplace violence hazards identified from the incident or investigation	
9	Responding to Emergencies (SEC. 4. Section 6401.9, c1 B, c2 G)	
9.1	Effective procedures to respond to actual or potential workplace violence emergencies	Pg 15-16
9.2	Effective means to alert employees of the presence, location, and nature of workplace violence emergencies	Pg 15-16
9.3	Evacuation or sheltering plans that are appropriate and feasible for the worksite	Pg 15-16
9.4	How to obtain help from staff assigned to respond to workplace violence Pg emergencies, if any, security personnel, if any, and law enforcement	
10	Training Procedures (SEC. 4. Section 6401.9, c1 B, c2 G)	
10.1	Procedures to develop and provide the training required (required training listed in #19)	Pg 23-25
11	Identify Concerns (SEC. 4. Section 6401.9, c1 B, c2 I)	
11.1	Procedures to identify and evaluate workplace violence hazards	Pg 17-19
11.2	Scheduled periodic inspections to identify unsafe conditions and work practices and employee reports and concerns	Pg 17-19
11.3	Inspection when the plan is first established	Pg 17-19
11.4	Inspection after each workplace violence incident	Pg 17-19
11.5	Inspection whenever the employer is made aware of a new or previously unrecognized hazard	Pg 17-19
		[
12	Address Concerns (SEC. 4. Section 6401.9, c1 B, c2 J)	
12.1	Procedures to correct workplace violence hazards identified and evaluated	Pg 20-22



12.2	Identified and evaluated in a timely manner ⁵	Pg 11, 20-22
13	After an Incident (SEC. 4. Section 6401.9, c1 B, c2 K)	
13.1	Procedures for post-incident response and investigation.	Pg 21-22
14	Plan Review (SEC. 4. Section 6401.9, c1 B, c2 L)	
14.1	Procedures to review the effectiveness of the plan and revise the plan as needed	Pg 4, 26
14.2	procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan	Pg 7-9
14.3	Reviewed at least annually	Pg 26
14.4	Review if deficiency is observed or becomes apparent, and after an incident	Pg 26
15	Updates by Division/Standard Board (SEC. 4. Section 6401.9, c1 B, c2 L)	
15.1	Procedures or other information required by the division and standards board as being necessary and appropriate to protect the health and safety of employees ⁶	
VIOLE	NT INCIDENT LOG	
16	Violence Incident Log Overview (SEC. 4. Section 6401.9, d1 A-C)	
16.1	The employer shall record information in a violent incident log for every workplace violence incident	Pg 27
16.2	Gathered from employees who experienced the workplace violence, on witness statements, and on investigation findings	Pg 7, 11, 27
16.3	omit any element of personal identifying information	Pg 27
16.4	Log is reviewed during periodic review of the plan	Pg 21
16.5	Multiemployer worksite must provide log to controlling employer	N/A
17	Violence Incident Log Details (SEC. 4. Section 6401.9, d2 A-H)	

 ⁵ As defined in <u>Section 3203 of Title 8 of the California Code of Regulation</u>
 ⁶ The division shall propose, no later than December 31, 2025, and the standards board shall adopt, no later than December 31, 2026, standards regarding the plan.



17.2The workplace violence type or types7Pg 2717.3A detailed description of the incidentPg 2717.4A classification of who committed the violence, including relationship to the workplace or employeesPg 2717.5A classification of circumstances at the time of the incident (e.g., poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location, etc.)Pg 2717.6Where the incident occurredPg 2717.7The type of incident (e.g., physical attack, weapon, threat, sexual assault, animal, etc.)Pg 2717.8Consequences of the incident (security/law enforcement contact, actions to protect employees)Pg 2717.9Name and job title of person completing log, and the date completedPg 2718.1Training for Employees (SEC. 4. Section 6401.9, e)Pg 23-2518.2Training material appropriate in content and vocabulary to the educational level, literacy, and language of employeesPg 23-2518.3Provide employees with initial training when the plan is first established and then annuallyPg 23-2518.4How to obtain a copy of the employer's plan at no costPg 23-2518.5Definitions (emergency, threat of violence, workplace violence, types of planPg 23-2518.6Definitions (emergency, threat of violence, workplace violence, types of planPg 23-2518.7How to report workplace violence incidents or concerns to the employer's planPg 23-2518.8Workplace viol			I
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	18.7		Pg 23-25
18.9Corrective measures the employer has implementedPg 23-25	18.8	Workplace violence hazards specific to the employees' jobs	Pg 23-25
	18.9	Corrective measures the employer has implemented	Pg 23-25

⁷ The four types of workplace violence are: (I) violence committed by a by a person who has no legitimate business at the worksite, (II) violence directed at employees by customers, clients, patients, students, inmates, or visitors, (III) violence against an employee by a present or former employee, supervisor, or manager, and (IV) violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee



18.10	How to seek assistance to prevent or respond to violence	Pg 23-25
18.11	Strategies to avoid physical harm ⁸	Pg 23-25
18.12	How to obtain copies of the violence incident log	Pg 23-25
18.13	How to obtain copies of records	
18.14	An opportunity for interactive questions and answers with a person knowledgeable about the employer's plan.	Pg 23-25
18.15	Additional training shall be provided when a new or previously unrecognized workplace violence hazard is identified and when changes are made to the plan.	Pg 23-25
18.16	The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.	Pg 23-25
DOCUN	1ENTATION	
19	Records (SEC. 4. Section 6401.9, f)	
19.1	Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for a minimum of five years	Pg 26
19.2	Training records shall be created and maintained for a minimum of one year	Pg 26
19.3	Training records include training dates, contents of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions	Pg 26
19.4	Violent incident logs required shall be maintained for a minimum of five years	Pg 26
19.5	Records of workplace violence incident investigations shall be maintained for a minimum of five years and <u>not</u> include medical information	Pg 26
19.6	All records must be provided upon request to the division	Pg 26
19.7	All records requested by employees shall be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request.	Pg 26

⁸ This includes access to <u>temporary restraining orders</u>



Appendix E: TVRA/CPTED Checklist

Exterior:

- 1. Walk the perimeter of the facility to look for security risks (fence holes, entry points, lack of security features, lack of lighting).
- 2. Is there easily visible signage on all sides of the facility? Are wayfinding and navigation signs adequate to aid police, fire, and emergency medical services in responding quickly to the facility?
- 3. Are there territorial reinforcements that show where the facility begins and ends?
- 4. Is landscaping well-maintained to provide a clear line of sight and prevent hiding?
 - Are hedges and vegetation trimmed to under three feet, and tree branches hanging no lower than six feet?
 - Are trees and other vegetation that could be used to gain access over fences or on rooftops cut back?
- 5. Is the parking area well-lit and clearly marked with appropriate signage?
- 6. Are there appropriate bollards or other measures?
- 7. Are there Knox boxes for fire? Are there ways for police to gain access?
- 8. Is access to the roof secured, including any ladders or dumpsters that can be climbed on?
- 9. Are utility access points locked and protected with bollards as appropriate?
- 10. Do CCTV cameras cover the entirety of the facility?
- 11. Are external lights operational in the evening to deter criminals

Interior:

- 1. What system is used for access control (keys, fobs/RIFD)? How are visitors identified (sign in/sign out)?
- 2. How many access doors are there, and are they kept locked?
- 3. Is there a clear line of sight from reception to the front door?
- 4. Are exterior windows easily locked?
- 5. Are there window coverings that can be drawn in case of an active assailant?
- 6. Are interior doors easily locked?
- 7. Are exit doors kept clear of obstructions and free of locks, chains, or fastening that would prevent escape from inside the building?
- 8. Is directional signage clear and easy to understand?
- 9. Are wall electrical panels and other utility access locked?



- 10. Are there all-hazard wall flip charts?
- 11. Are there sufficient medical kits, AEDs, mass casualty kits, and stop the bleed kits? Are employees trained on each?
- 12. Are there panic buttons? Are they static or moveable?
- 13. Is there a loudspeaker system? Does that system reach all areas of the facility and location? Is it in working order
- 14. Is there closed-circuit TV? Is it monitored? Are there "dead zones"? Do police have remote access to these systems in the case of an active shooter?
- 15. Are safer corners and/or refuge points clearly identified in each area of the facility?

Policy and Procedure:

- 1. Are there lockdown/barricade or secure site procedures? Do they use coded alerts or natural language?
- 2. Are any type of safety or training drills conducted?
- 3. Do employees make use of two-way radios?
- 4. Is there a general plan for flood, hazmat spill, active shooter, serious injury, earthquake, fire, or electrical outage?
- 5. Are activities kept in a high-visibility area to improve monitoring?
- 6. Is there a clear and consistent process for access control to the building?
- 7. Have blueprints been provided to police/dispatch of the facility?
- 8. Are emergency telephone numbers for fire, police, and medical services posted around the facility?



Appendix F: Training Calendar

Each program description is outlined in the "Training and Instruction" section of this WVPP.

Month	Торіс	Online or In- Person	Audience
September 2024	All-Hazard		All employees
November 2024	Situational Awareness		All employees
January 2025	Active Assailant Training		All employees
April 2025	Stop-the-Bleed		All employees
June 2025	General WVPP		All employees
August 2025	Conflict Resolution		All employees
October 2025	Ensuring Worker Wellness		All employees

Month	Торіс	Online or In- Person	Audience
October 2024	Critical Incident Response		Safety Committee
February 2025	Crisis Communication		Safety Committee



Appendix G: Sample Survey Questions

One of the easiest ways to approach quality assurance and employee engagement/involvement is to create a general survey given to employees throughout the year to help identify workplace violence concerns. Since involving employees in the process is included in the SB 553 mandate, engaging employees on these topics is essential to the WVPP. Climate surveys allow employees to share concerns anonymously, including concerns and risks that might not otherwise be shared out of fear of retaliation or negative impacts on their jobs or work relationships.

General Survey Questions

- 1. Do you know how to access CSB's Workplace Violence Prevention Plan (WVPP)?
- 2. Have you reviewed our WVPP?
- 3. Do you know what to report when seeing a potentially dangerous or violent concern?
- 4. Do you know how to make a report?
- 5. Do you feel like if you made a report, you would face negative consequences from your supervisor or colleagues?
- 6. If you see something unsafe and make a report about it, should you report it again if it hasn't been addressed?
- 7. Do you know that our WVPP must include employee ideas, feedback, and recommendations?

Active Assailant Survey Questions

- 1. Have you been trained to help others who are bleeding through tourniquets and woundpacking applications?
- 2. Do you understand the principles of Run, Hide, Fight?
- 3. Do you know the differences between lockdown/ barricade and shelter-in-place?
- 4. Do you know where the rally point is outside of the business?

Interpersonal Violence Survey Questions

- 1. Do you know some red flags you should report if you witness an employee argument or threat?
- 2. The WVPP only applies to employee-to-employee conflicts, not customer-to-employee (T/F).
- 3. Should you report or share any details about something bothering an employee outside of work?
- 4. Teasing and bullying behaviors in the workplace are just part of the normal ways employees blow off steam and don't need to be reported (T/F).



Training Survey Questions

- 1. Do you prefer training to be offered on-site and in person or online through videos and interactive elements?
- 2. Do you prefer having the training occur online so you can finish it at your own pace when convenient?
- 3. I found the training difficult to understand and not very interesting (T/F).
- 4. The training helped me feel more prepared for emergencies (T/F).