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It is encouraged that your organization seek independent legal counsel and/or contact your Cal/OSHA regional office. Cal/OSHA may also be contacted through phone at (800) 963-9424 or email at InfoCons@dir.ca.gov with respect to the Cal/OSHA Workplace Violence Prevention Plan requirements.

As with many other safety policies and practices, **it is encouraged that your organization maintain your Workplace Violence Prevention Plan as a stand-alone policy** and instead of incorporating it as part of an Emergency Action Plan (EAP) or Injury and Illness Prevention Plan (IIPP).

According to the legal requirements set forth in California Labor Code 6401.7 and 6401.9 as of the date of publication of this document, a **Workplace Violence Prevention Plan and associated training is required by all employers who have employees working in the State of California.** For multi-state organizations, it is recommended that all employees nationwide have access to the plan and associated training as employees from other states may travel to California for work.



This document is intended to provide suggestions on how to customize the Model Written Workplace Violence Plan for General Industry that has been published in February 2024 by the State of California Department of Industrial Relations (specifically Cal/OSHA). Your organization may choose to use the Cal/OSHA Model Plan as a starting point to be modified and completed as appropriate for your organization.

Responsibility

- Names or job titles of the person(s) responsible for implementing the plan.
 - Suggested support could come from: Facilities, Risk Management, Human Resources, and/or Legal. Ideally, there would be multiple members of your WVPP committee. Should you have multiple work locations, it is encouraged to have at least one person designated at each site.
- If multiple people are responsible, roles should be clearly defined such as:
 - Overall responsibility
 - Employee involvement and training
 - Emergency response
 - Hazard identification
 - Coordination with other employers
- Multiple locations
 - WVPP should be location specific.
 - Responsibility should include a location specific designated individual.

Next Step(s)

- After reviewing the plan requirements select individuals or roles to be responsible for the plan and implementation at each location. Be sure to designate at least one individual to be responsible for each location where work is being performed.
- Enter these roles or names into the WVP Plan with descriptions of responsibility.
- Delete additional roles included in template if they do not apply to your organization.

Employee active involvement

Examples

- Complete any and all training offered.
- Participate in safety meetings regarding security issues or potential WV hazards.
- Participate in WVPP Advisory Group separate from safety committee.
- Participate in Employee WVPP Survey when requested (Example available)
- WV hazard identification and correction
- Reporting and investigating

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Employee compliance

- Applies to supervisory and nonsupervisory employees.
- Should include regular training.
- Method(s) for determining compliance i.e. performance evaluations.
- Retraining and recognition

Next Step(s)

- Determine your security performance evaluation process.
- Determine methods of recognition i.e. memos, emails, or certificates of recognition
- Establish a timeline for when your WVPP will be regularly reviewed and updated.

Communication with employees

Describes the flow of WVP information to employees.

Examples

- Trainings
- Meetings
- Posters in common areas such as break rooms and/or bulletin boards containing other required notices
- Company e-mail or Emergency Text Alert system
- QR codes to find information on your organization's WVPP

Next Step(s)

- Determine an effective way to educate your team members which may include incorporation into regular safety meetings.
- Establish a method for communicating with employees in the case of a worksite incident.

Coordination with other employers

- Pertains to multi-employer worksites such as construction sites or office facilities who contracted workers through a third-party staffing agency.
- Defines roles and responsibilities for reporting and investigating WV incidents.
- Defines Violent Incident Log responsibilities.

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Next Step(s)

- Coordinate with other employers on shared sites to ensure that their organization has an established WVP and that employees are being regularly trained.

WV incident reporting procedure

- Effective procedure for your organization to accept and respond to workplace violence.
- Process to report to direct supervisor and/or WVPP administrator any acts or threats that could be concerning regarding workplace violence.

Next Step(s)

- Establish reporting tools and educate employees on how these tools should be utilized.
 - Anonymous hotline
 - Online form
 - Dedicated email or phone number to call or text.

Emergency response procedures

- Establish effective procedures to respond to actual or potential workplace violence emergencies.
- Develop a means to alert employees of the presence, location, and nature of workplace violence emergencies.
- Create evacuation or sheltering plans that are appropriate and feasible for the worksite.
- Reference location specific Emergency Action Plans.

Next Step(s)

- Decide what methods of communication your organization will use.
- Gather relevant contact information, links, QR codes etc. and update template to reflect your processes.
- Review and send employee WVPP survey.
- If you choose to form a WVPP Advisory Group, choose team members from all levels of the organization and coordinate a meeting to discuss their roles.
- Gather applicable evacuation maps and/or sheltering plans to include as appendices in WVPP.
- Perform site walk throughs with employees of all exits and safe sheltering places.

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- Post emergency contact information for on-site security (if applicable) in addition to emergency response services and local law enforcement.
- Update WVP Model Plan.

Workplace violence hazard identification and evaluation

- Consists of procedures to identify and evaluate Workplace Violence Hazards
- Includes periodic inspections to identify unsafe conditions and work practices as well as review and address employee reports and concerns.
- Hazard assessments should be conducted:
 - When the plan is first established
 - After each WV incident
 - Whenever the organization is made aware of a new or previously unrecognized hazard.

Next Step(s)

- Identify parties responsible for hazard assessment.
- Establish periodic inspection schedule to conduct regular WV hazard assessments.
- Select hazard assessment for inspections. (Example)available)
- Update WVP Model Plan.

Workplace violence hazard correction

Procedures to correct workplace violence hazards identified in a timely manner based on severity when:

- A hazard is observed or as soon as discovered.
- Imminent hazard exists.
- There are employee reports and concerns.

Next Step(s)

- Identify parties responsible for hazard correction.
- Select example controls applicable to your business.
- Update WVP Model Plan.
- Implement controls based on completed hazard assessments.

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Post-incident response and incident investigation

- Provide immediate care or first aid to injured employees.
- Conduct a comprehensive investigation to include:
 - Review of any specific risk factors and risk reduction measures
 - Identifying and interviewing employees involved in the incident.
 - Review any security footage available or reports written by emergency responders and/or law enforcement.
 - Making available individual trauma counseling to employees affected by the incident such as an Employee Assistance Program
 - Conduct a post-incident debriefing as soon as possible after the incident with all employees, supervisors, security, and others involved in the incident.
 - Reviewing whether appropriate corrective measures developed under the Plan - such as adequate staffing, provision, and use of alarms or other means of summoning assistance, and response by staff or law enforcement - were effectively implemented.

Next Step(s)

- Identify parties responsible for post-incident response and accident investigation.
- Establish incident investigation process.
- Create Violent Incident Log (Examples available)
- Update WVP Model Plan.

Training and instruction

Must be conducted on the following and match literacy and language understood by employees.

Training should include:

- The organization's WVPP, how to obtain a copy of the organization's plan at no cost, and how to participate in development and implementation of the organization's plan.
- The definitions and requirements of the organization's plan.
- How to report workplace violence incidents or concerns to the organization or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.

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- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- Training must be “interactive” to allow for employees to ask questions about the WVPQ&A.

Next Step(s)

- Identify parties responsible for training and instruction.
- Select an effective training program based on worksite exposures and legal requirements.
- Update WVP Model Plan.
- Deliver training, at minimum, upon hire and an on-going annual basis.

Employee access to the written WVPP

- Provided at no cost.
- All records must be made available by hard copy within 15 days unless otherwise accepted digitally.

Next Step(s)

- Establish methods for employees to submit requests such as a printed form or online request through e-mail or internal website.
- Identify method of delivery of the WVPP to the requesting employee.
- Determine where the most current WVPP can be viewed (i.e. hardcopy in generally accessible office location, the organization’s intranet, etc.)
- Update WVP Model Plan.

Recordkeeping

- Maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Maintain training records for a minimum of one (1) year.
 - Should include training date(s), agenda/summary of the training session, individuals conducting the training, names of employees who attended.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.
- Shall be made available to Cal/OSHA upon request for examination and copying.

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Next Step(s)

- Identify party(ies) responsible for recordkeeping.
- Establish recordkeeping process.
- Consider maintaining records at both a corporate and individual worksite level.
- Update WVP Model Plan.

Review and revision of the WVPP

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As exposure change or as needed.

Next Step(s)

- Identify party(ies) responsible for review and revision of WVPP.
- Establish process for review and revision of WVPP.
- Update WVP Model Plan.

The following is a list of sample policies, training or tools that your organization may already have in place through your Employee Handbook, Emergency Action Plan, and/or Injury and Illness Prevention Plan. If so, you may wish to reference those organizational policies that apply in an Appendix. However, in order to preserve the accuracy of this plan, it would be discouraged from attaching the current policy should it become updated apart from this plan document.

Appendices

Appendix A: Zero-Tolerance Workplace Violence Policy

Appendix B: Run, Hide, Fight Protocols

Appendix C: Sheltering/Shelter-in-Place Plan

Appendix D: Non-Retaliation Policy

Appendix E: Prohibition of Confronting Violent Persons Committing Criminal Acts

Appendix F: Violent Incident Log

Appendix G: Incident Investigation and Response Form

Appendix H: Workplace Violence Prevention Code of Conduct

Appendix I: Prohibition of Confronting Violent Persons Committing Criminal Acts

Appendix J: Workplace Violence Prevention Associate Survey

Appendix K: Workplace Violence Prevention Incident Report Form

Appendix L: Workplace Violence Prevention Hazard Assessment & Control Checklist

Appendix M: Workplace Violence Prevention Program Assessment Checklist

Appendix N: Restraining Orders Policy and Procedure

Addendum O: Employer's Filing Procedure for a Restraining Order

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