



Loss Control TIPS

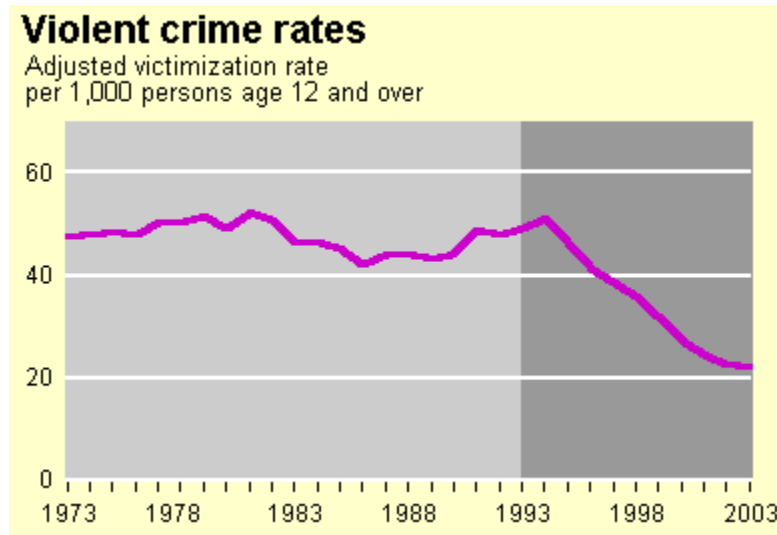
Technical Information Paper Series

Innovative Safety and Health SolutionsSM

Workplace Violence Prevention Program

Introduction

Although workplace violence continues to be a problem for American business, overall violent crime rates have actually declined in recent years, from a high in 1994 of 51.2 violent victimizations per 1000 population, age 12 and over, to an all time low in 2003 of 22.3 (see chart).



Note:

The violent crimes included are rape, robbery, aggravated and simple assault, and homicide. The National Crime Victimization Survey redesign was implemented in 1993; the area with the lighter shading is before the redesign and the darker area after the redesign. The data before 1993 are adjusted to make them comparable with data collected since the redesign. The adjustment methods are described in *Criminal Victimization 1973-95*. Estimates for 1993 and beyond are based on collection year while earlier estimates are based on data year. For additional information about the methods used, see *Criminal Victimization 2003*.



Sources: Rape (excluding sexual assault), robbery, and assault data are from the **National Crime Victimization Survey** (NCVS). Ongoing since 1972, this survey of households interviews about 75,000 persons age 12 and older in 42,000 households twice each year about their victimizations from crime. The homicide data are collected by the **FBI's Uniform Crime Reports** (UCR) from reports from law enforcement agencies.

Although these statistics are encouraging, violence in the workplace continues to be a leading cause of occupational fatalities in the United States. Nearly 16 percent of the 5,915 occupational fatalities that occurred in 2000 were due to assaults and violent acts. Some 2 million American workers are victims of workplace violence each year. It is estimated that costs of workplace violence to employers is in the billions of dollars. Homicide remains the third leading cause of fatal occupational injuries for all workers and the second leading cause of occupational injuries for women.

In addition to the human costs, businesses suffer economic losses when their employees are victims of workplace violence. Major costs include:

- Business interruption costs
- Loss of productivity
- Increase in Workers' Compensation costs
- Increase in litigation costs
- Public relations costs

While the news media regularly reports on violent loss of life, the actual problem goes well beyond these high-visibility incidents. In 1993, a study by the National Safe Workplace Institute estimated the cost of workplace violence at \$4.2 billion annually. In 1994, the Workplace Violence Research Institute conducted another study and determined that the actual cost to be substantially higher. Their estimate was \$36 billion annually. Given the wide range represented by these studies, the actual cost may lie somewhere in between. Regardless, workplace violence in American business presents significant costs, and is a major risk management concern.

Workplace Violence Defined

Defining workplace violence is not as easy as it would seem. There are many different ways to define it. The National Institute for Occupational Safety and Health (NIOSH, <http://www.cdc.gov/niosh/about.html>) defines workplace violence as follows: violent acts, including physical assaults and threats of assault, directed toward persons at work or on duty.

The Occupational Safety and Health Administration (OSHA, www.osha.gov) expands this definition to the following: Workplace violence is any physical assault, threatening behavior or verbal abuse occurring in the work setting. It includes but is not limited to beatings, stabbings, suicides, shootings, rapes, near suicides, psychological traumas such as threats, obscene phone calls, an intimidating presence, and harassment of any nature such as being followed, sworn at or shouted at.

For statistical purposes, the law enforcement community defines workplace violence as the commission of proscribed criminal acts or coercive behavior which occurs in the work setting. It includes but is not limited to homicides, forcible sex offenses, kidnapping, assault, robbery, menacing, reckless endangerment, harassment and disorderly conduct. The term coercive behavior is intended to convey the sense that workplace violence may take forms in addition to the use of force. The aggressor may use berating language, physical or verbal threats or damage personal property.

NIOSH also defines the workplace itself as any location, either permanent or temporary, where any employee performs any work-related duty. This includes the buildings, parking lots, client's homes, and traveling to and from work assignments.

As one may discern from the above paragraphs, workplace violence definitions vary, sometimes significantly. It should also be noted that most sources acknowledge that a large number of violent incidents go unreported, which would make the actual scope of the problem substantially greater than the data suggests.

Types of Workplace Violence

Any number of sources lists a number of factors that may increase a worker's risk of being exposed to workplace violence, including homicide. These include:

- Exchange of money with the public
- Working alone or in small numbers
- Working late at night or early in the morning hours
- Working in high crime areas
- Guarding valuable property or possessions
- Working in community-based settings (retail establishments, taxi drivers, police and security personnel, and healthcare providers)

Workplace violence incidents can be divided into categories, depending on the relationship between the assailant and the worker or workplace:

- Violence by strangers (criminal intent) (Type I): The perpetrator has no legitimate relationship to the business or its employees, and is usually committing a crime in conjunction with the violence. These crimes can include robbery, shoplifting, and trespassing. The vast majority of homicides (85%) fall into this category.
- Violence by customer/client (Type II): The perpetrator has a legitimate relationship with the business and becomes violent while being served by the business. This category includes customers, clients, patients, students, inmates, and any other group for which the business provides services. It is believed that a large proportion of customer/client incidents occur in the healthcare industry, in settings such as nursing homes or psychiatric facilities; the victims are often patient caregivers. Police officers, prison staff, flight attendants, and teachers are some other examples of workers who may be exposed to this kind of workplace violence.

- Violence by Co-Worker (Worker on Worker) (Type III): The perpetrator is an employee or past employee of the business who attacks or threatens another employee(s) or past employee(s) in the workplace. Worker-on-worker fatalities account for approximately 7% of all workplace violent homicides. This type of violence can usually be divided into two sub-types: violence between supervisors and subordinates, and violence between co-workers or peers.
- Violence by Personal Relationships (Type IV): The perpetrator usually does not have a relationship with the business but has a personal relationship with the intended victim. This category includes victims of domestic violence assaulted or threatened while at work. Also included is an individual who has a personal dispute with the worker and enters the workplace to harass, threaten, injure, or kill.

Laws and Regulations

There are no federal laws or regulations that specifically address the prevention of workplace violence. There are several state statutes that are aimed at reducing workplace violence in specific industries. California and Washington have enacted regulations aimed at reducing patient-employee violence in health care settings. At least three states (Florida, Virginia, and Washington) have laws or regulations intended to prevent robbery-related homicides in late-night retail establishments such as convenience stores.

Both Federal and State OSHA regulations have what is known as the “General Duty Clause.” The Federal statute requires that each employer:

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- shall comply with occupational safety and health standards promulgated under this Act.

This requires the employer to include in safety programs the prevention of “reasonably foreseeable” violence to employees.

There are also local statutes, such as ordinances requiring bullet-proof barriers in taxicabs that have appeared in U.S. cities including Los Angeles, Chicago, New York City, Baltimore, Boston, Albany (NY), and Oakland (CA).

The employer’s duty includes inspecting the workplace to discover and correct any dangerous conditions or hazards and to give adequate training to employees who may encounter these conditions or hazards. An employer that has experienced acts of workplace violence, or becomes aware of threats, or intimidation or other potential indicators showing that the potential for violence in the workplace exists or has the potential to exist, would be on notice of the risk of workplace violence and may be required to implement a workplace violence prevention program. In terms of employer defense, the employer must make a good-faith effort to prevent violence in the workplace.

Developing a Workplace Violence Prevention Program

Employers should consider establishing, implementing and maintaining a written Workplace Violence Prevention Program. The program should be made available to any employee who may be subjected to potential violence in the workplace.

The workplace violence prevention program should reflect the level and nature of threat faced by the employee(s)/employer. The potential for and/or source(s) of violence in a specific workplace requires a review and assessment of the vulnerability to the four categories of violence previously mentioned; violence by strangers, client/customers, co-workers, and personal relationships.

- When violence may be committed by strangers, workers can be victimized both in and outside the "traditional" workplace, but while acting within the course and scope of their employment. Use of specific training, staffing and protective equipment coupled with effective physical security methods, and policies must be reviewed and assessed.
- Two basic types of violence by client/customer(s) against workers are of concern. The first involves individuals that may have a history of violent behavior, such as prison inmates, mental health service recipients. Situations where this may occur are usually well recognized, and prevention focuses on appropriate staffing, and specialized training, augmented with other control measures. The second arises when client or customers may be "situationally" violent and are provoked when they become frustrated by delays or by the denial of benefits or social services. In these cases, problem anticipation, appropriate training and other control measures deemed effective are the focus for prevention.
- Coworker violence can occur on several levels; between supervisors and subordinates or between non-supervisory and supervisory workers at the same level or different levels. A well written violence prevention policy which treats all employees fairly, training in conflict and dispute resolution and active involvement of trained Employee Assistance Program (EAP) personnel, is appropriate in these circumstances.
- Finally, the potential for violence resulting from personal relationships must be considered. Estranged domestic partners may seek out their victims while they are at work. Employees who may be victims of domestic violence need to be aware and feel secure in alerting their employers to the potential for a workplace attack. Strict policies should be implemented that 1) address the confidentiality of personal employee information (i.e. home address, work schedules), 2) deny or restrict workplace access to employee relatives or outside visitors, and 3) allow flexibility in the use of leave, work schedules or transfers in situations where employee(s) may be at risk of violence.

To be successful, workplace violence prevention efforts must have commitment from top management and must involve supervisors, employees and employee representatives. Commitment and involvement are essential in any safety and health program. Management provides the organizational resources along with the motivating forces necessary to deal effectively with safety and security hazards. Employees should be involved, both individually and collectively, through participation in worksite assessment, assisting in the development of

clear effective procedures and by identifying existing and potential hazards. Employee knowledge and experience should be incorporated into any written plan to correct and prevent safety and security hazards.

Elements of a Workplace Violence Prevention Program

The major elements of a Workplace Violence Prevention Program include the following:

- Workplace Violence Policy Statement
- Threat Assessment Team
- Hazard Assessment
- Hazard Control and Prevention
- Employee Training and Education
- Incident Reporting, Investigation, Follow-Up and Evaluation
- Recordkeeping

Workplace Violence Policy Statement

A clearly written policy statement which demonstrates top management's commitment to employee's safety and health is an important element for workplace violence prevention. The policy should emphasize employees' participation and employer's zero tolerance for violence. In addition, the policy should require prompt and accurate reporting of violent incidents and be consistently fair to all employees.

The written policy should state that the employer:

- will provide adequate authority and budgetary resources to responsible parties so that identified goals and assigned responsibilities can be met;
- includes and encourages employee participation in the design and implementation of its workplace violence prevention program;
- refuses to tolerate violence at the workplace, and has developed and implemented a program to reduce incidents of violence;
- applies workplace violence policies consistently and fairly to all employees, including supervisors and managers.
- requires prompt and accurate reporting of violent incidents, whether or not physical injury has occurred;
- will not discriminate against victims of workplace violence.

The policy should be easily accessible to all employees and copies should be made available to employees upon request.

Threat Assessment Team

The initial step in developing a workplace violence prevention program is to select a Threat Assessment Team. The Team should meet regularly, prepare written reports, review investigations, recommend and implement employee training, and communicate with employees. Members of the Team should include representatives from senior management, operations, legal, security, human resources, and risk management. The responsibility for auditing the overall workplace violence prevention program should rest with the Threat Assessment Team.

Hazard Assessment

The elements of a hazard assessment include record reviews, workplace security analysis, and workplace surveys.

Records review

The Threat Assessment Team can begin its work by reviewing previous incidents of violence. A review and analysis of existing records is necessary to develop a baseline, by identifying patterns that may indicate the causes and severity of violence incidents, identifying changes necessary and developing an appropriate plan to correct these hazards. When the records are available, the Threat Assessment Team should analyze the following:

- OSHA 300 Logs and any other appropriate required records
- Incident reports
- Records of, or information compiled for recording of, assault incidents or near assault incidents
- Medical records
- Insurance records
- Workers Compensation records
- Police reports
- Accident investigations
- Training records
- Grievances
- Other relevant records or information (such as, minutes of meetings, etc.)

The Threat Assessment Team should identify and analyze any apparent trends in assault incidents relating to particular departments, units, job titles, unit activities, time of day, etc. The Threat Assessment Team should communicate with similar local businesses, trade associations, community and civic groups concerning their experience with workplace violence.

Workplace Security Analysis

In addition to a records review, the Threat Assessment Team should inspect the workplace as well as evaluate the work tasks of employees to determine the presence of hazards, conditions, operations and situations which might place workers at risk of occupational violence incidents.

The Threat Assessment Team should periodically conduct follow-up inspections of the workplace and observe hazardous work tasks.

Workplace Questionnaires/Surveys

A questionnaire or survey should be distributed to employees to identify the potential for violent incidents and to identify or confirm the need for improved security. All employees should be encouraged to complete the questionnaire. Employee questionnaires should be reviewed, updated and distributed as needed, or at least once within a twenty-four month period. Results should be analyzed and used to revise and improve the overall content and implementation of the Workplace Violence Prevention Program.

Hazard Control and Prevention

The Threat Assessment Team should identify and institute a combination of control methods designed to eliminate or mitigate the risks of violence incidents. Traditional methods of engineering and administrative controls include the following:

Engineering Controls	Administrative Controls
<ul style="list-style-type: none"> • Control access to building 	<ul style="list-style-type: none"> • Train employees in emergency action and safety
<ul style="list-style-type: none"> • Enhance outside visibility of entrances 	<ul style="list-style-type: none"> • Develop escape plans
<ul style="list-style-type: none"> • Install interior and exterior lighting 	<ul style="list-style-type: none"> • Develop working relationships with local authorities
<ul style="list-style-type: none"> • Install security devices, such as, alarms, video cameras, corner mirrors, etc. 	<ul style="list-style-type: none"> • Close business during late evening and night hours
<ul style="list-style-type: none"> • Hire and train security personnel 	<ul style="list-style-type: none"> • Assign two or more employees to work at all times
<ul style="list-style-type: none"> • Install bullet-resistant glass in reception area 	<ul style="list-style-type: none"> • Provide escort to accompany staff to parking lots
<ul style="list-style-type: none"> • Use drop safes to minimize cash on hand 	<ul style="list-style-type: none"> • Provide management support during emergencies
	<ul style="list-style-type: none"> • Respond promptly to all complaints
	<ul style="list-style-type: none"> • Require employees to report violence incidents to management

Employee Training and Education

Training should take place on company time, and should be offered in languages spoken by the employees. All employees, regardless of their level of risk, should be trained in the following:

- Techniques for recognizing the potential for violence
- Procedures, policies and work environment arrangements developed to control the risk to workers
- Proper use of safety hardware
- The appropriate response to incidents of violence, including emergency and hostage situations
- How to obtain medical assistance and follow-up
- Procedures for reporting, investigating and documenting incidents of violence
- Travel safety
- Cash handling procedures.

In addition, workers and supervisors should receive training to enable them to recognize a potentially hazardous situation or to make necessary changes in the physical plant, staffing policy, or procedures. Also, managers and supervisors should be trained to ensure that employees are not placed in assignments that compromise safety. They should also receive training concerning how to behave compassionately toward co-workers when incidents do occur.

Incident Reporting, Investigation, Follow-Up and Evaluation

Incident Reporting

Develop a written procedure for reporting violent incidents. This procedure should apply to all types of violent incidents, whether or not physical injury has occurred (e.g., verbal abuse, threats of violence, etc.). The reporting procedure should be available to and easily understood by all employees. Employees should not fear reprisal for bringing their concerns to management's attention; therefore, ensuing confidentiality is imperative.

Each incident should be reported to and evaluated by the Threat Assessment Team. Once an incident occurs, the employer should:

- Report it to the local police department
- Secure the work areas where disturbances occurred
- Ensure the physical safety of employees and others remaining in the area
- Ensure that no work area is left short-staffed while others assist the victim or help in securing the area
- Quickly assess the work area, if it was disturbed or damaged during an incident, to determine if it is safe
- Provide critical incident debriefing to victims, witnesses and other affected employees

Incident Investigation

After an incident occurs, conduct a detailed investigation. The investigation should be focused on fact-finding to prevent recurrence, not fault-finding. When conducting the investigation, the Threat Assessment Team should:

- Collect facts on who, what, when, where and how the incident occurred
- Record all pertinent information
- Recommend corrective action
- Consider changes in controls, procedures, policy

Follow-Up

Following a violent incident, establish procedures for responding quickly and appropriately to the medical and psychological needs of employees. Encourage employees to use existing Employee Assistance Programs (EAPs). Where no program exists, establish one or contract with an outside provider on a temporary basis.

Evaluation

After completing the initial workplace security analysis, the Threat Assessment Team should conduct periodic physical evaluations of the worksite. These evaluations should focus on the identification and assessment of workplace security hazards, and should address changes in employee work practices that will minimize risk of workplace violence.

Record keeping

Recordkeeping is an essential element of a workplace violence prevention program. It provides the information that is necessary to conduct risk analysis, identify training needs, and conduct program evaluation. Maintain these records:

- OSHA 300 Log, if applicable
- Incidents of assaults
- Incidents of abuse, verbal attacks or aggressive behavior
- Minutes of safety meetings and inspection reports
- Training records
- Inspection records
- Employee questionnaires
- Insurance records
- Workers' Compensation records
- Medical records

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COMPLETED WPVP PROGRAM (EXAMPLE)
ABC COMPANIES WPVP PROGRAM POLICY STATEMENT
JANUARY 1, 1996

Our establishment, **ABC COMPANY**, is concerned and committed to our employees' safety and health. We refuse to tolerate violence in the workplace and will make every effort to prevent violent incidents from occurring by implementing a Workplace Violence Prevention Program (WPVP). We will provide adequate authority and budgetary resources to responsible parties so that our goals and responsibilities can be met.

All managers and supervisors are responsible for implementing and maintaining our WPVP Program. We encourage employee participation in designing and implementing our program. We require prompt and accurate reporting of all violent incidents whether or not physical injury has occurred. We will not discriminate against victims of workplace violence.

A copy of this Policy Statement and our WPVP Program is readily available to all employees from each manager and supervisor.

Our program ensures that all employees, including supervisors and managers, adhere to work practices that are designed to make the workplace more secure, and do not engage in verbal threats or physical actions which create a security hazard for others in the workplace.

All employees, including managers and supervisors, are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.

The management of our establishment is responsible for ensuring that all safety and health policies and procedures involving workplace security are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

Our Program will be reviewed and updated annually.

WORKPLACE VIOLENCE PREVENTION PROGRAM

THREAT ASSESSMENT TEAM

A Threat Assessment Team will be established and part of their duties will be to assess the vulnerability to workplace violence at our establishment and reach agreement on preventive actions to be taken. They will be responsible for auditing our overall Workplace Violence Program.

The Threat Assessment Team will consist of:

Name: John Smith	Title: Vice President	Phone: 555-1212
Name: Jane Doe	Title: Operations	Phone: 555-1234
Name: Frank Kras	Title: Shop Steward	Phone: 555-1233
Name: James Brown	Title: Security	Phone: 555-1456
Name: Susan Dean	Title: Treasurer	Phone: 555-1567
Name: Tom Jones	Title: Legal Counsel	Phone: 555-1678
Name: Sally Field	Title: Personnel	Phone: 555-1789

The team will develop employee training programs in violence prevention and plan for responding to acts of violence. They will communicate this plan internally to all employees.

The Threat Assessment Team will begin its work by reviewing previous incidents of violence at our workplace. They will analyze and review existing records identifying patterns that may indicate causes and severity of assault incidents and identify changes necessary to correct these hazards. These records include but are not limited to, OSHA 200 logs, past incident reports, medical records, insurance records, workers compensation records, police reports, accident investigations, training records, grievances, minutes of meetings, etc. The team will communicate with similar local businesses and trade associates concerning their experiences with workplace violence.

Additionally, they will inspect the workplace and evaluate the work tasks of all employees to determine the presence of hazards, conditions, operations and other situations with might place our workers at risk of occupational assault incidents. Employees will be surveyed to identify the potential for violent incidents and to identify or confirm the need for improved security measures. These surveys shall be reviewed, updated and distributed as needed or at least once within a two year period.

Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence will be performed by the following representatives of the Assessment Team, in the following areas

of our workplace:

Representative: **John Smith** Area **General Office**

Representative: **Frank Kras** Area **Shop and Lab**

Representative: **Jane Doe** Area **Reception & Sales**

Periodic inspections will be performed according to the following schedule:

First Monday of Every Month

Frequency (Daily, weekly, monthly, etc.)

HAZARD ASSESSMENT

On **September 5, 1995**, the Threat Assessment Team completed the hazard assessment. This consisted of a records review, inspection of the worksite and employee survey.

Records Review - The Threat Assessment Team reviewed the following records:

OSHA 200 logs for the last three years

Incident reports

Records of or information compiled for recording of assault incidents or near assault incidents

Insurance records

Police reports

Accident investigations

Training records

Grievances

Other relevant records or information: **Workers' Compensation records.**

From these records, we have identified the following issues that need to be addressed:

- * **employees have been assaulted by irate clients;**
- * **employees have been assaulted while traveling alone;**
- * **there have been several incidents of assault and harassment among employees.**

WORKPLACE SECURITY ANALYSIS

Inspection - The Threat Assessment Team inspected the workplace on **July 31, 1995.**

From this inspection the following issues have been identified:

- * **access to the building is not controlled; and it is not limited to any of the offices on the four floors that we occupy. There have been problems with non-employees entering private work areas;**
- * **doors to the restrooms are not kept locked;**
- * **lighting in the parking lot is inadequate;**
- * **in client service area, desks are situated in a way that make it necessary for employee to walk past the client in order to leave area. There are many objects on top of desks that could be used as weapons (i.e., scissors, stapler, file rack, etc.).**

Review of Tasks - The Threat Assessment Team also reviewed the work tasks of our employees to determine the presence of hazards, conditions, operations and situations which might place workers at risk of occupational assault incidents. The following factors were considered:

- * **Exchange of money with the public**
- * **Working alone or in small numbers**
- * **Working late at night or early in the morning hours**
- * **Working in a high crime area**
- * **Guarding valuable property or possessions**

- * **Working in community settings**
- * **Staffing levels**

From this analysis, the following issues have been identified:

- * **employees in client service area exchange money with clients;**
- * **there are several employees who work very late hours or come in very early in the morning in the shop and lab areas.**

WORKPLACE SURVEY

Under the direction of the Threat Assessment Team, we distributed a survey among all of our employees to identify any additional issues that were not noted in the initial stages of the hazard assessment. From that survey, the following issues have been identified:

- * **employees who work in the field have experienced threats of violence on several occasions, and there have been several near miss incidents. Employees noted that they were unsure of how to handle the situation and that they are often afraid to travel by themselves to areas they perceive are dangerous;**
- * **employees who work directly with clients in the office have also experienced threats, both verbal and physical, from some of the clients.**

WORKPLACE HAZARD CONTROL AND PREVENTION

In order to reduce the risk of workplace violence, the following measures have been recommended:

Engineering Controls and Building and Work Area Design

- * **Employees who have client contact in the facility, will have their work areas designed to ensure that they are protected from possible threats from their clients.**
- * **Changes to be completed as soon as possible and include:**
 - * **arranging desks and chairs to prevent entrapment of the employees;**

- * **removing items from the top of desks, such as scissors, staplers, etc. that can be used as a weapon;**
- * **installing panic buttons to assist employees when they are threatened by clients. The buttons can be activated by one's foot. The signal will be transmitted to a supervisor's desk, as well as the security desk, which is always staffed.**

Management has instituted the following as a result of the workplace security inspection and recommendations made by the Threat Assessment Team:

- * **Installation of plexi-glass payment window for employees who handle money and need to take payments from clients (number of employees who take money will be strictly limited);**
- * **Adequate lighting systems installed for indoor building areas as well as areas around the outside of the facility and in the parking areas. The lighting systems will be maintained on a regular basis to ensure safety to all employees;**
- * **Locks installed on restroom doors and keys will be given to each department. Restroom doors are to be kept locked at all times. Supervisors will ensure that the keys are returned to ensure continued security for employees in their areas.**
- * **Installation of panic buttons in employees work areas.**
- * **Memorandum to all employees requesting that they remove any items from their desks that can be used as a weapon, such as scissors, staplers, etc.**

These changes were completed by **January 1, 1996.**

Policies and Procedures developed as a result of the Threat Assessment Team recommendations:

- * **Employees who are required to work in the field and who feel that the situation is unsafe should travel in "buddy" systems or with an escort from their supervisor.**

- * **Employees who work in the field will report to their supervisor periodically throughout the day. They will be provided with a personal beeper or cellular phone, which will allow them to contact assistance should an incident occur.**
- * **Access to the building will be controlled. All employees have been given a name badge which is to be worn at all times. If employees come in early, or are working past 7:30 p.m., they must enter and exit through the main entrance.**
- * **Visitors will be required to sign in at the front desk. All clients must enter through the main entrance to gain access.**

TRAINING AND EDUCATION

Training for all employees, including managers and supervisors, was given on **September 11, 1995**. This training will be repeated every two years.

Training included:

- * **a review and definition of workplace violence;**
- * **a full explanation and full description of our program (all employees were given a copy of this program at orientation);**
- * **instructions on how to report all incidents including threats and verbal abuse;**
- * **methods of recognizing and responding to workplace security hazards;**
- * **training on how to identify potential workplace security hazards (such as no lights in parking lot while leaving late at night, unknown person loitering outside the building, etc.)**
- * **review of measures that have been instituted in this organization to prevent workplace violence including:**
- * **use of security equipment and procedures;**
- * **how to attempt to diffuse hostile or threatening situations;**
- * **how to summon assistance in case of an emergency or hostage situation;**

- * **post-incident procedures, including medical follow-up and the availability of counseling and referral.**

Additional specialized training was given to:

- * **Employees who work in the field;**
- * **Employees who handle money with clients;**
- * **Employees who work after hours or come in early.**

Specialized training included:

- * **Personal safety;**
- * **Importance of the buddy system;**
- * **Recognizing unsafe situations and how to handle them during off hours.**

This training was conducted by in-house staff, with assistance from the local police department on October 1, 1995 and will be repeated every two years.

Trainers were qualified and knowledgeable. Our trainers are professionals **certified by the Society of Industrial Security.**

At the end of each training session, employees are asked to evaluate the session and make suggestions on how to improve the training.

All training records are filed with **the Human Resource Department/Personnel Department.**

Workplace Violence Prevention training will be given to new employees as part of their orientation.

A general review of this program will be conducted every two years. Our training program will be updated to reflect changes in our Workplace Prevention Program.

INCIDENT REPORTING AND INVESTIGATION

All incidents must be reported within **Four (4) hours.** An "Incident Report Form" will be completed for all incidents. One copy will be forwarded to the Threat Assessment Team for their review and a copy

will be filed with **the Human Resource/Personnel Department.**

Each incident will be evaluated by the Threat Assessment Team. The team will discuss the causes of the incident and will make recommendations on how to revise the program to prevent similar incidents from occurring. All revisions of the Program will be put into writing and made available to all employees.

RECORDKEEPING

We will maintain an accurate record of all workplace violence incidents. All incident report forms will be kept for a minimum of **seven (7) years**, or for the time specified in the Statute of Limitations for our local jurisdiction.

Any injury which requires more than first aid, is a lost-time injury, requires modified duty, or causes loss of consciousness, will be recorded on the OSHA 300 log. Doctors' reports and supervisors' reports will be kept of each recorded incident, if applicable.

Incidents of abuse, verbal attack, or aggressive behavior which may be threatening to the employee, but not resulting in injury, will be recorded. These records will be evaluated on a regular basis by the Threat Assessment Team.

Minutes of the Threat Assessment Team meetings shall be kept for **three (3) years.**

Records of training program contents, and the sign-in sheets of all attendees, shall be kept for **five (5) years.** Qualifications of the trainers shall be maintained along with the training records.

SAMPLE

SELF INSPECTION SECURITY CHECKLIST

Facility: _____

Inspector: _____

Date of Inspection: _____

1. **Security Control Plan:** _____ Yes _____ No

If yes, does it contain:

- (A) Policy Statement _____ Yes _____ No
- (B) Review of Employee Incident Exposure _____ Yes _____ No
- (C) Methods of Control _____ Yes _____ No
 - If yes, does it include:
 - Engineering _____ Yes _____ No
 - Work Practice _____ Yes _____ No
 - Training _____ Yes _____ No
 - Reporting Procedures _____ Yes _____ No
 - Recordkeeping _____ Yes _____ No
 - Counseling _____ Yes _____ No
- (D) Evaluation of Incidents _____ Yes _____ No
- (E) Floor Plan _____ Yes _____ No
- (F) Protection of Assets _____ Yes _____ No
- (G) Computer Security _____ Yes _____ No
- (H) Plan Accessible to All Employees _____ Yes _____ No
- (I) Plan Reviewed and Updated Annually _____ Yes _____ No
- (J) Plan Reviewed and Updated When Tasks Added or Changed _____ Yes _____ No

2. **Policy Statement by Employer** _____ Yes _____ No

3. **Work Areas Evaluated by Employer** _____ Yes _____ No
If yes, how often? _____

4. **Engineering Controls** _____ Yes _____ No
If yes, does it include:

- (A) Mirrors to see around corners and in blind spots _____ Yes _____ No
- (B) Landscaping to provide unobstructed view of the workplace _____ Yes _____ No



- (C) "Fishbowl effect" to allow unobstructed view of the interior Yes No
- (D) Limiting the posting of sale signs on windows Yes No
- (E) Adequate lighting in and around the workplace Yes No
- (F) Parking lot well lighted Yes No
- (G) Door Control(s) Yes No
- (H) Panic Button(s) Yes No
- (I) Door Detector(s) Yes No
- (J) Closed Circuit TV Yes No
- (K) Stationary Metal Detector Yes No
- (L) Sound Detection Yes No
- (M) Intrusion Detection System Yes No
- (N) Intrusion Panel Yes No
- (O) Monitor(s) Yes No
- (P) Video Tape Recorder Yes No
- (Q) Switcher Yes No
- (R) Hand Held Metal Detector Yes No
- (S) Hand held video camera Yes No
- (T) Personnel traps ("Sally Traps") Yes No
- (U) Other _____ Yes No

5. Structural Modifications

- Plexiglas, glass guard, wire glass, partitions, etc. Yes No

If yes, comment: _____

6. Security Guards

- (A) If yes, are there an appropriate number for the site? Yes No
- (B) Are they knowledgeable of the company WPVP Policy? Yes No
- (C) Indicate if they are:
 Contract Guards (1)
 In-house Employees (2)
- (D) At Entrance(s) Yes No
- (E) Building Patrol Yes No
- (F) Guards provided with communication? Yes No



If yes, indicate what type: _____

(G) Guards receive training on Workplace Violence situations? _____ Yes _____ No

Comments: _____

7. **Work Practice Controls** _____ Yes _____ No
If yes, indicate:

- (A) Desks Clear of Objects which may become Missiles _____ Yes _____ No
- (B) Unobstructed Office Exits _____ Yes _____ No
- (C) Vacant (Bare) Cubicles Available _____ Yes _____ No
- (D) Reception Area Available _____ Yes _____ No
- (E) Visitor/Client Sign In/Out _____ Yes _____ No
- (F) Visitor(s)/Client(s) Escorted _____ Yes _____ No
- (G) Barriers to Separate Clients from Work Area _____ Yes _____ No
- (H) One Entrance Used _____ Yes _____ No
- (I) Separate Interview Area(s) _____ Yes _____ No
- (J) I.D. Badges Used _____ Yes _____ No
- (K) Emergency Numbers Posted By Phones _____ Yes _____ No
- (L) Internal Phone System _____ Yes _____ No
- If yes, indicate:
- Does it Use 120 VAC Building Lines _____ Yes _____ No
- Does it Use Phone Lines _____ Yes _____ No
- (M) Internal Procedures for Conflict (Problem) Situations _____ Yes _____ No
- (N) Procedures for employee dismissal _____ Yes _____ No
- (O) Limit Spouse & Family Visits to Designated Areas _____ Yes _____ No
- (P) Key Control Procedures _____ Yes _____ No
- (Q) Access Control to the Workplace _____ Yes _____ No
- (R) Objects which may become Missiles Removed from Area _____ Yes _____ No
- (S) Parking Prohibited in Fire Zones _____ Yes _____ No

Other: _____



7a. Off Premises Work Practice Controls

(For staff who work away from a fixed workplace, such as: social services, real estate, utilities, policy/fire/sanitation, taxi/limo, construction, sales/delivery, messengers, and others.)

- (A) Trained in hazardous situation avoidance Yes No
- (B) Briefed about areas where they work Yes No
- (C) Have reviewed past incidents by type and area Yes No
- (D) Know directions and routes for day's schedule Yes No
- (E) Previewed client/case histories Yes No
- (F) Left an itinerary with contact information Yes No
- (G) Have periodic check-in procedures Yes No
- (H) After hours contact procedures Yes No
- (I) Partnering arrangements if deemed necessary Yes No
- (J) Know how to control/defuse potentially violent situations Yes No
- (K) Supplied with personal alarm/cellular phone/radio Yes No
- (L) Limit visible clues of carrying money/valuables Yes No
- (M) Carry forms to record incidents by area Yes No
- (N) Know procedures if involved in incident (see also Training Section) Yes No

8. Training Conducted

Yes No

If yes, is it:

- (A) Prior to Initial Assignment Yes No
- (B) At Least Annually Thereafter Yes No
- (C) Does it Include:
 - Components of security control plan Engineering and Workplace Controls Instituted at Workplace Yes No
 - Techniques to Use in Potentially Volatile Situations Yes No
 - How to Anticipate/Read Behavior Yes No
 - Procedures to Follow After an Incident Yes No
 - Periodic Refresher for On-Site Procedures Yes No
 - Recognizing Abuse/Paraphernalia Yes No
 - Opportunity for Q and A with Instructor Yes No



- On hazards unique to job tasks Yes No
9. **Written Training Records Kept** Yes No
10. **Are Incidents Reported** Yes No
 If yes, are they:
- (A) Reported in Written Form Yes No
- (B) First Report of Injury Form (If Employee Loses Time) Yes No
11. **Incidents Evaluated** Yes No
- (A) EAP Counseling Offered Yes No
- (B) Other Action (Reporting Requirements, suggestions, reporting to local authorities, etc.) _____
-
- (C) Are Steps Taken to Prevent Recurrence? Yes No
12. **Floor Plans Posted Showing Exits, Entrances, Location of Security Equipment, Etc.** Yes No
 If yes, does it:
- (A) Include an Emergency Action Plan, Evacuation Plan, and/or a Disaster Contingency Plan? Yes No
13. **Do Employees Feel Safe** Yes No
- (A) Have employees been surveyed to find out their concerns Yes No
- (B) Has the employer utilized the crime prevention services and/or lectures provided by the local or State police? Yes No

Comments: _____



SAMPLE INCIDENT REPORT FORM

- 1. VICTIMS NAME: _____ JOB TITLE: _____
- 2. VICTIMS ADDRESS: _____
- 3. HOME PHONE NUMBER: _____ WORK PHONE NUMBER: _____
- 4. EMPLOYERS NAME AND ADDRESS: _____
- 5. DEPARTMENT/SECTION: _____
- 6. VICTIMS SOCIAL SECURITY NUMBER: _____
- 7. INCIDENT DATE _____
- 8. INCIDENT TIME: _____
- 9. INCIDENT LOCATION: _____
- 10. WORK LOCATION (if different): _____
- 11. TYPE OF INCIDENT: (circle one): Assault, Robbery, Harassment, Disorderly Conduct, Sex Offense, Other. (Please Specify)

(See attached - DEFINITION OF INCIDENTS WORKSHEET)

12. WERE YOU INJURED: (circle): Yes No

If yes, please specify your injuries and the location of any treatment:



13. DID POLICE RESPOND TO INCIDENT: Yes No

14. WHAT POLICE DEPARTMENT: _____

15. POLICE REPORT FILED: Yes No

REPORT NUMBER: _____

16. WAS YOUR SUPERVISOR NOTIFIED: Yes No

17. SUPERVISORS NAME: _____

18. WAS THE LOCAL UNION/EMPLOYEE REPRESENTATIVE NOTIFIED: Yes/no
Who should be notified _____

19. WAS ANY ACTION TAKEN BY EMPLOYER: (specify) _____

20. ASSAILANT/PERPETRATOR: (circle one): Intruder, Customer,
Patient, Resident, Client, Visitor, Student, Co-Worker, Former,
Employee, Supervisor, Family/Friend, Other, (specify): _____

21. ASSAILANT/PERPETRATOR - NAME/ADDRESS/AGE (if known): _____

22. PLEASE BRIEFLY DESCRIBE THE INCIDENT: _____

23. INCIDENT DISPOSITION: (Circle all that apply): No action taken,
Arrest, Warning, Suspension, Reprimand, Other: _____

24. DID THE INCIDENT INVOLVE A WEAPON: Yes/no Specify _____



25. DID YOU LOSE ANY WORK DAYS: Yes No
Specify _____

26. WERE YOU SINGLED OUT OR WAS THE VIOLENCE DIRECTED AT MORE THAN ONE INDIVIDUAL: _____

27. WERE YOU ALONE WHEN THE INCIDENT OCCURRED: _____

28. DID YOU HAVE ANY REASON TO BELIEVE THAT AN INCIDENT MIGHT OCCUR: Yes No
Why: _____

29. HAS THIS TYPE OR SIMILAR INCIDENT(S) HAPPENED TO YOU OR YOUR CO-WORKERS: Yes No
Specify: _____

30. HAVE YOU HAD ANY COUNSELING OR SUPPORT SINCE THE INCIDENT: Yes No
Specify: _____

31. WHAT DO YOU FEEL CAN BE DONE IN THE FUTURE TO AVOID SUCH AN INCIDENT: _____

32. WAS THIS ASSAILANT INVOLVED IN PREVIOUS INCIDENTS: _____

33. ARE THERE ANY MEASURES IN PLACE TO PREVENT SIMILAR INCIDENTS: Yes No
Specify: _____

34. HAS CORRECTIVE ACTION BEEN TAKEN:
Specify: _____

35. COMMENTS: _____



SAMPLE EMPLOYEE SECURITY SURVEY

This survey will help detect Security Problems in your building or at an alternate worksite.

Please fill out this form, get your co-workers to fill it out and review it to see where the potential for major security problems lie.

NAME: _____

WORK LOCATION: _____
(IN BUILDING OR ALTERNATE WORKSITE)

1. Do either of these two conditions exist in your building or at your alternate work site?

- Work alone during working hours.
 No notification given to anyone when you finish work.

Are these conditions a problem? If so when, please describe. (For example, Mondays, evening, daylight savings time)

2. Do you have any of the following complaints (that may be associated with causing an unsafe worksite)?
(Check all that apply)

- Does your work place have a written policy to follow for addressing general problems?
 Does your work place have a written policy on how to handle a violent client
 When and how to request the assistance of a co-worker
 When and how to request the assistance of police
 What to do about a verbal threat
 What to do about a threat of violence
 What to do about harassment
 Working alone
 Alarm System(s)
 Security in and out of building
 Security in parking lot
 Have you been assaulted by a co-worker?
 To your knowledge have incidents of violence ever occurred between your co-workers?

3. Are violence related incidents worse during shift work, on the road or in other situations.

Please specify: _____

4. Where in the building or worksite would a violence related incident most likely to occur?

lounge exits deliveries private offices

parking lot bathroom entrance Other

Other (specify) _____

5. Have you ever noticed a situation that could lead to a violent incident?
6. Have you missed work because of a potential violent act(s) committed during your course of employment?
7. Do you receive workplace violence related training or assistance of any kind?
8. Has anything happened recently at your worksite that could have lead to violence?
9. Can you comment about the situation?
10. Has the number of violent clients increased?

DEFINITION OF INCIDENTS

1. **ASSAULT:**
The intentional use of physical injury, (impairment of physical condition or substantial pain) to another person, with or without a weapon or dangerous instrument.
2. **CRIMINAL MISCHIEF:**
Intentional or reckless damaging of the property of another person without permission.
3. **DISORDERLY CONDUCT:**
Intentionally causing public inconvenience, annoyance or alarm or recklessly creating a risk thereof by fighting (without injury) or in violent numinous or threatening behavior or making unreasonable noise, shouting abuse, misbehaving, disturbing an assembly or meeting or persons or creating hazardous conditions by an act which serves no legitimate purpose.
4. **HARASSMENT:**
Intentionally striking, shoving or kicking another or subjecting another person to physical contact, or threatening to do the same (without physical injury). ALSO, using abusive or obscene language or following a person in about a public place, or engaging in a course of conduct which alarms or seriously annoys another person.
5. **LARCENY:**
Wrongful taking, depriving or withholding property from another (no force involved). Victim may or may not be present.
6. **MENACING:**
Intentionally places or attempts to place another person in fear of imminent serious physical injury.
7. **RECKLESS ENDANGERMENT:**
Subjecting individuals to danger by recklessly engaging in conduct which creates substantial risk of serious physical injury.
8. **ROBBERY:**
Forcible stealing of another's property by use of threat of immediate physical force. (Victim is present and aware of theft).
9. **SEX OFFENSE:**
Public Lewdness: Exposure of sexual organs to others.
Sexual Abuse: Subjecting another to sexual contact without consent.
Sodomy: A deviant sexual act committed as in rape.
Rape: Sexual intercourse without consent.

Risk Factors That Contribute to Workplace Violence:

- A poor economy
- Increased trend to define ourselves by our jobs
- Significant rise in stress level
- Easy availability of guns and other types of weapons
- Company downsizing
- Occupation - Industries and occupations at high risk:
 - Taxi cabs
 - Convenience stores
 - Gas stations
 - Healthcare
 - Social service
 - Police Departments.

Defusing Volatile Situations or Aggressive Behavior:

- Stay calm and composed
- Establish eye contact
- Have an escape route behind you
- Don't try to strike or overpower or physically engage the person
- Control your tone of voice and be careful with words. Usually best to say nothing
- Train supervisors to recognize the signs of a troubled employee
- Intervene before an incident is critical
- Provide job counseling for employees who have been laid off or fired
- Provide personal counseling through an employee assistance program
- Establish procedures for handling grievances

What an Organization Can Do to Prevent Workplace Violence:

- Use effective personnel selection procedures
 - Background checks
 - Prior employer checks
 - Reference checks
 - Pre-employment testing
 - Interview and follow-up
- Incorporate workplace conduct policies into new employee orientation
- Use effective supervisory training
 - Train supervisors to pay attention to the early warning signs of stress
 - Provide meaningful education and training programs
 - Stress management
 - Effective communication
 - Conflict resolution
 - Teambuilding
 - Managing change
 - Termination training
 - Dealing with difficult people
- Provide on-site support services, such as Employee Assistance Professionals, to assist victims
- Provide debriefing for senior management
- Provide debriefing for employees
- Foster a supportive, harmonious work environment
- Provide employees with safety education programs including educational materials and seminars about ways to maximize safety at work
- Review company policies and procedures annually

Background Checks:

Companies can use any number of measures to screen our potentially violent employees:

- Require each prospective employee to provide a resume
- Require each prospective employee to complete and sign an employment application
- Use an application form that indicates that false statements are grounds for termination
- Develop a company policy relative to background checks (get assistance from legal counsel). The degree of investigation should be proportional to degree of risk presented by the job.

Items to check include:

- Work history
- References
- Education
- Criminal history (convictions only)
- Credit records
- Motor vehicle records
- Military record (must have written consent)

A background search will not, by itself, prevent or predict all incidents of workplace violence, but failure to take such prudent steps leaves employers vulnerable to a negligent hiring suit.

Preventing Armed Robbery:

In addition to developing a policy that addresses the company's views regarding threatening behavior, the organization should implement measures to prevent violence from outside sources. Instituting such measures is important because employees are not the only persons who pose a serious threat to a company's workers. The primary defense is a security program that includes external lighting, silent alarms and cameras, and bullet-proof barriers.

Armed robberies account for almost 50% of all violent acts in the workplace. Employees at businesses such as convenience stores, bars, restaurants, gas stations, and liquor stores are among those most likely to encounter on-the-job violence. Among some of the safety measures that will reduce the crime hazard are:

- Improved lighting inside and outside stores
- Safe building layouts that ensure that cashiers can easily be seen from the street or sidewalks
- Burglar alarms connected to alarm companies or police departments
- Drop safes to minimize accumulation of cash on hand
- Access control

Risk managers for companies with operations in high crime areas may need to implement additional safety programs. One example would be to place cashier stations in a bullet-proof glass enclosure. Another safety measure is to escort employees to their cars at the end of the shift.

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