



Best Practices for a Workplace Violence Prevention Program

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Agenda

- ❑ Background
- ❑ Best Practices
 - Task Force
 - CalOSHA SB553
 - Checklists
 - Exercises
- ❑ Assessing Hazards
- ❑ What's On The Horizon





Background



What Is Workplace Violence?

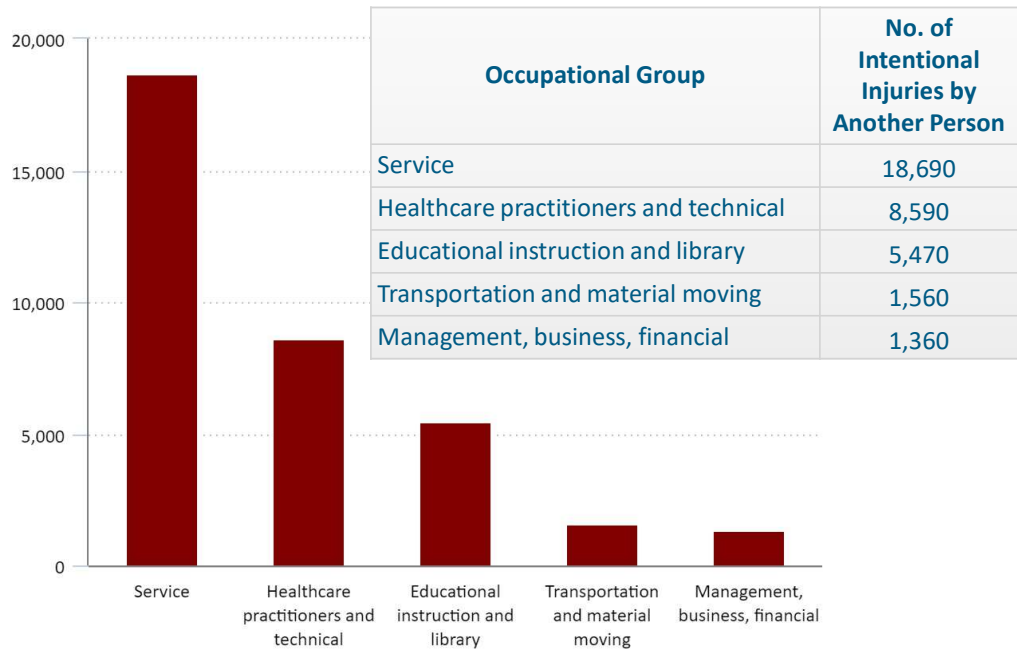
- OSHA Definition: Any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the worksite.
 - Verbal threats
 - Physical confrontations



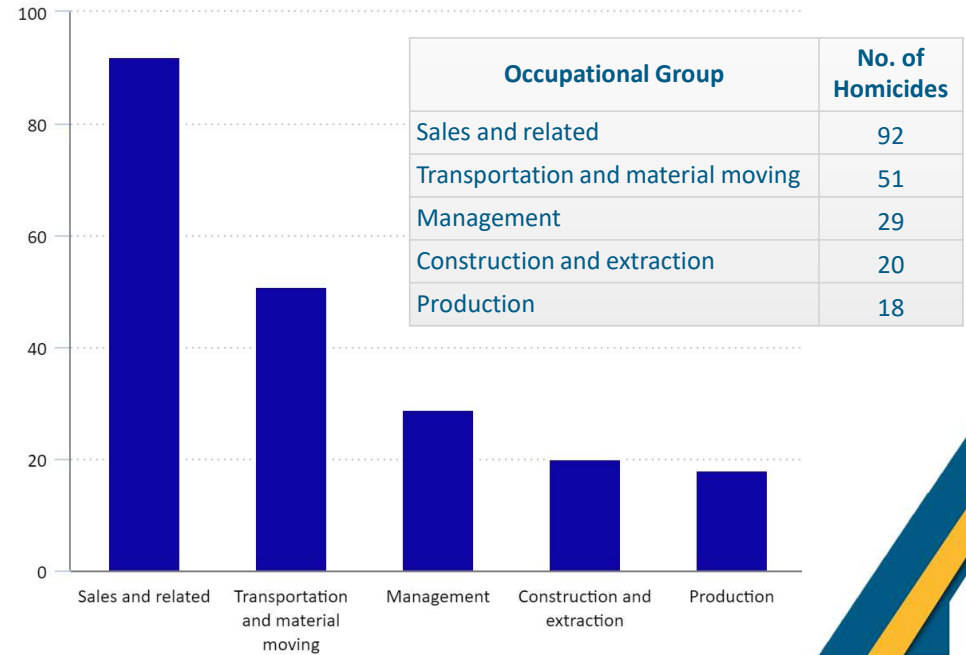
The Numbers

□ 3rd leading cause of fatal occupational injuries in the U.S.

Nonfatal workplace intentional injuries by another person that required at least a day away from work, selected occupational groups, 2020



Workplace homicides by selected occupational group, 2020



<https://www.bls.gov/opub/ted/2022/workplace-violence-homicides-and-nonfatal-intentional-injuries-by-another-person-in-2020.htm>





Four Categories



1. Violent acts by criminals with no connection
2. Violence directed at the organization
3. Violence against coworkers
4. Violence due to personal connections



Who Is At Risk?

Individuals who:

- ❑ Isolated
- ❑ Work with the public
- ❑ High-stress environments
- ❑ Handle cash/valuables
- ❑ History of violence or aggression



How Can Hazards Be Reduced?

Reduce risk

- Zero-tolerance policy
- Assessment
 - Program
 - Controls
- Prevention programs
 - Separate or incorporated into existing programs





Employers' Role In Prevention

“Employers have a legal and ethical obligation to promote a work environment free from threats and violence.”

- ❑ Develop a reporting process
- ❑ Investigate incidents
- ❑ Respond to emergencies
- ❑ Identify and correct hazards





Best Practice #1 Task Force



Task Force Or Committee

Management Commitment and Worker Participation

- ❑ Value of a safe and healthful, violence-free workplace
- ❑ Allocating appropriate authority and resources
- ❑ Assigning responsibility and authority
- ❑ Accountability
- ❑ Support and implementation
- ❑ Policies on reporting, recording and monitoring incidents

Task Force Or Committee Outputs



1. Articulate a policy and establish goals
2. Allocate sufficient resources
3. Uphold program performance expectations

Involvement and feedback from all levels of the organization

Committee Focus

Participation and involvement in:

- Program
- Facility design review
- Risky activities
- Discussions and assessment
- Reporting
- Procedures and retaliation prevention
- Training





Best Practice #2 CalOSHA Requirements



How Can Hazards Be Reduced?

CalOSHA SB 553, required by July 1, 2024

1. Create a Workplace Violence Prevention Plan
2. Incorporate Injury and Illness Prevention Program Requirements
3. Train Employees
4. Record Incidents of Violence
5. Properly Maintain Records

Workplace Violence Prevention Plan

- ❑ Identify and evaluate hazards
- ❑ Procedures to correct in a timely manner
- ❑ Training and instructions
- ❑ System for compliance
- ❑ Employee participation
- ❑ Response
- ❑ Prohibition of retaliation
- ❑ Communication
- ❑ Investigation



Incorporate IIPP Requirements

Injury and Illness Prevention Program (IIPP)

- ❑ System for communication
- ❑ Conduct periodic inspections
- ❑ Opportunity to request and examine incident reports
- ❑ Provide copies no later than 5 business days after request



Train Employees

- Initial and annually
- Plan, copies and participation
- Definitions
- Reporting
- Hazards
- Corrective measures implemented
- Assistance
- Violent Incident Log and copies



Record Incidents Of Violence

- ❑ Witnesses
- ❑ Statements
- ❑ No personal identifying information of witnesses
- ❑ Date, time, location
- ❑ Type
- ❑ Classifications of offender, circumstance and location
- ❑ Consequences
- ❑ Date, name and job title of who made the log entry





Workplace Violence Types


There are 4 distinct types classified under SB 553:

- ❑ **Type 1** - someone with no legitimate business interests at the worksite
- ❑ **Type 2** - directed at employees by customers, clients, patients, students, inmates, or visitors
- ❑ **Type 3** - between current employees or current and former employee
- ❑ **Type 4** - non-employee who has a personal relationship with an employee

Maintain Records

- ❑ Hazards including identification, evaluation, and correction
- ❑ Minimum of 5 years
- ❑ Training records: 1 year
- ❑ Violent Incident Logs and investigations: 1 year
- ❑ Restraining Orders





Best Practice #3 Create a Checklist



Checklists

General

- ❑ CalOSHA or NIOSH Templates
- ❑ Risk factors
- ❑ Complete for job tasks or specific areas

	YES	NO	Notes/Follow-up Action
Do employees have contact with the public?			
Do they exchange money with the public?			
Do they work alone?			
Do they work late at night or during early morning hours?			
Is the workplace often understaffed?			
Is the workplace located in an area with a high crime rate?			
Do employees enter areas with a high crime rate?			
Do they have a mobile workplace (patrol vehicle, work van, etc.)?			
Do they deliver passengers or goods?			
Do employees perform jobs that might put them in conflict with others?			
Do they ever perform duties that could upset people (deny benefits, confiscate property, terminate child custody, etc.)?			
Do they deal with people known or suspected of having a history of violence?			
Do any employees or supervisors have a history of assault, verbal abuse, harassment, or other threatening behavior?			
Other risk factors – please describe:			

<https://www.osha.gov/sites/default/files/publications/osha3148.pdf>
<https://www.cdc.gov/niosh/topics/violence/default.html>



Checklists

Inspecting Work Areas

- “Walkaround” Inspections
- Include:
 - Exterior Building Area
 - Parking Areas
 - Security Measures
- Focus on worker interaction

	All Areas	Some Areas	Few Areas	No Areas	NOTES/FOLLOW-UP ACTION
Are nametags or ID cards required for employees (omitting personal information such as last name and home address)?					
Are workers notified of past violent acts in the workplace?					
Are trained security and counseling personnel accessible to workers in a timely manner?					
Do security and counseling personnel have sufficient authority to take all necessary action to ensure worker safety?					
Is there an established liaison with state police and/or local police and counseling agencies?					

<https://www.osha.gov/sites/default/files/publications/osha3148.pdf>

<https://www.cdc.gov/niosh/topics/violence/default.html>





Program Assessment Checklist

- ❑ Comprehensive
- ❑ Completed routinely (i.e. annually)
- ❑ Include assessment of:
 - Staffing
 - Training
 - Design
 - Security measures
 - Procedures
 - Lone worker tasks
 - Awareness and response



Program Assessment Checklist

	Yes	No	NOTES
STAFFING			
Is there someone responsible for building security?			
Who is it?			
Are workers told who is responsible for security?			
Is adequate and trained staffing available to protect workers who are in potentially dangerous situations?			
Are there trained security personnel accessible to workers in a timely manner?			
SECURITY MEASURES – Does the workplace have?			
Physical barriers (Plexiglas partitions, elevated counters to prevent people from jumping over them, bullet-resistant customer windows, etc.)?			
Security cameras or closed-circuit TV in high-risk areas?			
Panic buttons – (portable or fixed)			
Alarm systems?			

<https://www.osha.gov/sites/default/files/publications/osha3148.pdf>

<https://www.cdc.gov/niosh/topics/violence/default.html>





Program Assessment Checklist

	Yes	No	NOTES
TRAINING			
Are workers trained in the emergency response plan (for example, escape routes, notifying the proper authorities)?			
Are workers trained to report violent incidents or threats?			
Are workers trained in how to handle difficult clients or patients?			
Are workers trained in ways to prevent or defuse potentially violent situations?			
FACILITY DESIGN			
Are there enough exits and adequate routes of escape?			
Can exit doors be opened only from the inside to prevent unauthorized entry?			
Is the lighting adequate to see clearly in indoor areas?			
Are there employee-only work areas that are separate from public areas?			





Program Assessment Checklist

	Yes	No	NOTES
WORKPLACE PROCEDURES			
Are employees given maps and clear directions in order to navigate the areas where they will be working?			
Is public access to the building controlled?			
Are floor plans posted showing building entrances, exits, and location of security personnel?			
Are these floor plans visible only to staff and not to outsiders?			
OUTSIDE THE FACILITY			
Do workers feel safe walking to and from the workplace?			
Are the entrances to the building clearly visible from the street?			
Is the area surrounding the building free of bushes or other hiding places?			
Is video surveillance provided outside the building?			





Best Practice #4 Exercises

Table –Top Exercises Or Simulations

- What is a table-top?
 - Hypothetical exercise
 - Facilitator led
 - Identify gaps
- Cost effective
- Allows for discussion and examination



Conducting The Table-Top



- ❑ Before you begin, fill the roles:
 - Facilitator
 - Participants
 - Evaluator
 - If possible, include representatives from law enforcement

- ❑ Establish goals

Run The Exercise



- ❑ Prepare the team
 - Describe the scenario
 - Be cognizant of triggers
- ❑ Converse on response
- ❑ First responders
- ❑ Add in new or unexpected variables
 - Restricted exits
 - Disabled communication



Reflect And Review

- Allow time for discussion
- Evaluation
- Contents of the After-Action Report
 - A summary of expectations and goals
 - A recap of the meeting and its proceedings
 - Things that went well and should be replicated in the future
 - Things that were excluded or didn't go well
 - Areas of improvement
- Share report



What's On The Horizon

Potential Standard

- ❑ Healthcare and Social Assistance
- ❑ 2018 BLS Survey:
 - Higher in psychiatric and substance abuse hospitals, residential mental healthcare facilities

Chart 1. Incidence rate of nonfatal workplace violence to healthcare workers, 2011-18

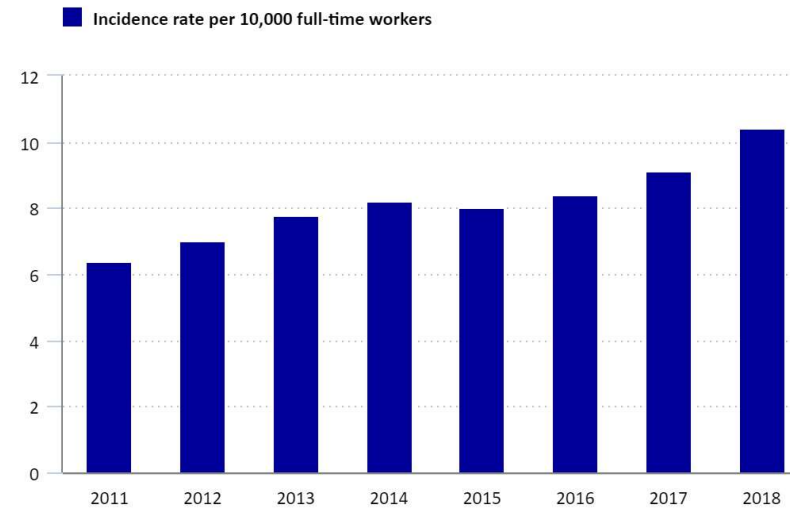
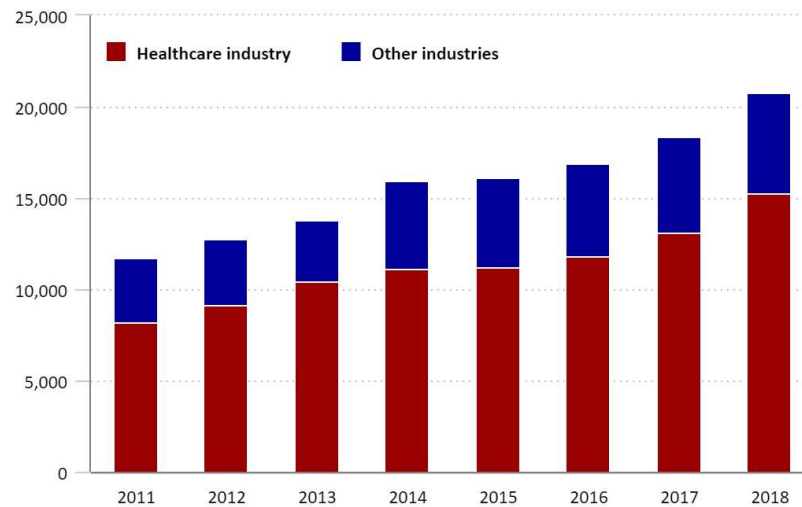


Chart 2. Number of nonfatal workplace violence injuries and illnesses with days away from work, 2011-18



Year	Incidence Rate (per 10,000 full-time workers)
2011	6.4
2012	7.0
2013	7.8
2014	8.2
2015	8.0
2016	8.4
2017	9.1
2018	10.4

<https://www.bls.gov/iif/factsheets/workplace-violence-healthcare-2018-chart2-data.htm>





What Might A New Standard Include?

- ❑ Workplace violence prevention programs (WVPP)
- ❑ Hazard assessments
- ❑ Workplace violence control measures
- ❑ Training
- ❑ Violent incident investigation and recordkeeping
- ❑ Anti-retaliation provisions
- ❑ Approaches to protecting workers without stigmatizing healthcare patients and social assistance clients

Enforcement

- ❑ General Duty Clause, 29 U.S.C. § 654(a)(1)
- ❑ Citations and Hazard Alert Letters
- ❑ Majority in healthcare





Conclusion



Three Key Take Aways

1. Ensure your employees are trained in and clearly understand how to prevent and respond to workplace violence incidents.
2. A comprehensive Workplace Violence Prevention Program can be a considerable undertaking; however, the goal is to prepare and prevent violence in the workplace.
3. Proposed California standard changes are aggressive and will pave the way for future Federal changes.

Thank you!

Questions or Comments?

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Ms. Sparks is a Managing Consultant at ALL4 LLC, an environmental, health and safety consulting firm in Lexington, KY. Her firm is focused on environmental and OSHA, EPA and DOT compliance, management systems, digital solutions and more. She has assisted in the development and expansion of the EHS practice within ALL4 by providing resources and client support with safety program development, industrial hygiene exposure assessments, hazardous waste and EPCRA reporting, air quality compliance, emergency planning and response, incident investigations, and ISO 14001 and 45001 management systems.

Ms. Sparks has a Bachelor of Science degree in Environmental Health Science from Eastern Kentucky University. She also holds a Master of Science degree in Occupational Safety, Security and Emergency Management from Eastern Kentucky University and is the Health and Safety Technical Lead at ALL4.

Workplace Violence Prevention

The topic of workplace violence tends to dominate the news in the days following a major incident, but not every instance of workplace violence generates national headlines. This presentation will highlight understanding workplace violence prevention and response, best practices for a workplace violence prevention program, assessing the hazards in different settings, California's recent updates, and planning ahead for what could be on the horizon.