# Workplace Violence Prevention Plan

# Tips and Considerations

**Applicability.** This Plan will help you comply with the federal workplace safety general duty clause (United States Code Title 29, Section 654) which states 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.”

According to OSHA’s interpretation of the applicability of the general duty clause to workplace violence, in a workplace where the risk of violence and serious personal injury are significant enough to be “recognized hazards,” the general duty clause would require the employer to take feasible steps to minimize those risks. Failure of an employer to implement feasible means of abatement of these hazards could result in the finding of a violation under the general duty clause. On the other hand, the occurrence of acts of violence which are not recognized as characteristic of employment and represent random antisocial acts which may occur anywhere would not subject the employer to a citation for a violation.

This Plan should be developed and implemented in conjunction with your workplace Emergency Action Plan, substance abuse program, safety committee operations, and employee discipline policies.

**Conduct a hazard assessment—identify all risk factors and conditions for violence.** According to the U.S. Bureau of Labor Statistics (2005), the following risk factors contributed to much higher percentages of workplace violence than the national average:

* Working directly with the public
* Mobile workplace
* Working with unstable or violent persons
* Working in high-crime areas
* Guarding valuable goods or property
* Working in community-based settings (e.g., hospitals)

Other conditions that are early signs of potential workplace violence include:

* Current or former disgruntled employee
* An angry customer, spouse, or relative of an employee
* Terrorist threats
* Disciplining or firing an employee
* Employee abuse of drugs or alcohol
* Harassment by co-workers
* Mental illness
* Work-related stress

OSHA has identified healthcare workers, social service workers, late-night retail employees, and taxi and livery drivers at increased risk of workplace violence.

**Create a committee.** Once the company policy has been drafted, distributed, and acknowledged as read and understood by all employees, consider creating a standing committee on workplace violence. This group will track all violent incidents throughout the company and train supervisors in how to manage incidents. The committee can be called the crisis management team, crisis intervention team, violence-prevention team, or another appropriate name. It is typically made up of six to eight people representing HR, the employee assistance program, unions (if there are any), legal, executive management, and security. Insert the contact information for this committee into the Program Administration table in the Plan.

**Periodically reevaluate your Plan.** Your violence prevention plan will benefit greatly from periodic evaluation. The evaluation process could involve the following:

* Review the results of periodic safety audits.
* Review and analyze post-incident reports; pay attention not just to what went wrong, but to actions taken by employees that avoided further harm, such as handling a shoplifting incident in such a way as to avoid escalation to violence.
* Examine reports and minutes from staff meetings on safety and security issues.
* Analyze trends and rates in illnesses, injuries, or fatalities caused by violence relative to initial or “baseline” rates.
* Consult with employees before and after making job or worksite changes to determine the effectiveness of the interventions.
* Keep abreast of new strategies to deal with violence in your industry.
* Communicate any lessons learned from evaluating the workplace violence prevention plan to all employees. For example, discuss changes in the plan during regular meetings of the safety committee, with union representatives, or with other employee groups.

**Post the policy.** If your company deals with the public or has many customers or other nonemployee visitors, post the antiviolence policy prominently near all entrances and exits and in conference rooms. Outsiders will be forewarned, and your employees will gain an extra measure of security.

**Consider notifying others about your violence policy.** You may want to communicate the workplace violence policy to customers and vendors. Your company may want to consider how it provides notice of its policies concerning weapons and what notices may be deterrents to persons considering violence (e.g., posting handgun prohibition at all entrances; posting notice about surveillance cameras; posting notice that your employees cannot open the safe; that the premises is equipped with an alarm system).

**Review and incorporate state regulatory requirements.** This plan is based on federal requirements and/or best practices. Some states have laws and regulations that are stricter than federal requirements and may impact how you customize this plan. Click on the link below to view state requirements on this topic. After reviewing the specific information for your state(s), you can edit the plan accordingly.

# [Company name]

# Workplace Violence Prevention Plan

Plan last updated: **[date]**

# Authority and Scope

Authority: United States Code Title 29, Section 654 (General Duty Clause) **[Replace with the state law if applicable.]**

Scope: All employees of **[name]** and other personnel doing business on **[name]** property.

# Policy Statement

**[name]** is concerned and committed to our employees’ safety and health. We have a policy of zero tolerance for violence in the workplace and will make every effort to prevent violent incidents from occurring through implementation of this Workplace Violence Prevention Plan. 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 this Plan. We encourage employee participation in the design, implementation, and periodic revision of this Plan. 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 Plan 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.

# Plan Administration

|  |  |  |
| --- | --- | --- |
| **Function** | **Name/Title** | **Contact Information** |
| Plan Administrator |  | Work phone: Cell phone: |
| Human Resources Manager |  | Work phone: Cell phone: |
| Threat Assessment Analyst |  | Work phone: Cell phone: |
| Supervisor |  | Work phone: Cell phone: |

**Plan Administrator.** The Plan Administrator will ensure that:

* A thorough workplace violence hazard assessment has been completed.
* The Plan is complete and updated as required.
* The Plan is available to all **[name]** personnel.
* Appropriate safety and law enforcement personnel have completed an on-site review of safety and security of buildings and offices.

**Human Resources Manager.** The Human Resources Manager will:

* Provide for supervisory training which includes basic leadership skills, such as setting clear standards of conduct and performance, addressing employee problems promptly, and using the probationary period, performance counseling, discipline, alternative dispute resolution, and other management tools conscientiously.
* Provide technical expertise and consultation to help supervisors determine what course of administrative action is most appropriate in specific situations.
* Determine whether sufficient evidence exists to justify taking disciplinary action once the investigation of any misconduct is complete.
* Help supervisors determine proper and reasonable accommodation.

**Threat Assessment Analyst.** The Threat Assessment Analyst will:

* Review previous incidents of violence at the workplace.
* Analyze and review existing records identifying patterns that may indicate causes and severity of assault incidents and identify changes necessary to correct hazards.
* 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 workers at risk of occupational assault incidents.

**Supervisors.** Supervisors must:

* Inform employees of workplace violence policies and procedures.
* Ensure that employees know specific procedures for dealing with workplace threats and emergencies, and how to contact police, fire, and other safety and security officials.
* Ensure that employees with special needs are aware of emergency evacuation procedures and have assistance (as necessary) regarding emergency evacuation situations.
* Respond to potential threats and escalating situations by utilizing proper resources from local law enforcement and medical services, human resources staff, and the Employee Assistance Program (EAP).
* Take all threats seriously.
* Check prospective employees’ backgrounds prior to hiring.
* Coordinate with other co-located agencies to develop joint workplace violence prevention plans.

**Employees.** Employees must:

* Attend all employee orientation sessions upon initial employment.
* Be familiar with **[name]** policy regarding workplace violence.
* Be responsible for securing their own workplace.
* Be responsible for questioning and/or reporting strangers to supervisors.
* Be aware of any threats, physical or verbal, and/or any disruptive behavior of any individual and report such to supervisors.
* Be familiar with local procedures for dealing with workplace threats and emergencies.
* Do not confront individuals who are a threat.
* Be familiar with the resources of the EAP.
* Take all threats seriously.

## Plan Review and Update

This Plan will be reviewed and updated annually, and whenever:

* The workplace policies of **[name]** change.
* Regulations or regulatory agency policies change.
* Violence incident rates demonstrate that the Plan is not effective.

# Definitions

*Assault—*the intentional use of physical injury (impairment of physical condition or to cause substantial pain) to another person, with or without a weapon or dangerous instrument.

*Disorderly conduct—*intentionally causing public inconvenience, annoyance, or alarm, or recklessly creating a risk thereof by fighting (without injury), or in violent or threatening behavior, or making unreasonable noise, shouting abuse, misbehaving, disturbing an assembly, meeting, or persons, or creating hazardous conditions by an act which serves no legitimate purpose.

*First aid—*one-time treatment and follow-up for observation of minor injuries, including cuts, abrasions, bruises, first-degree burns, sprains, and splinters. It includes using nonprescription medications at nonprescription strength; cleaning, flushing, or soaking wounds on the skin surface and using wound coverings such as bandages, Band-Aids, and gauze pads.

*Harassment—*intentionally striking, shoving, or kicking another, 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 a public place, or engaging in a course of conduct which alarms or seriously annoys another person.

*Larceny*—wrongful taking, depriving, or withholding property from another (no force involved). Victim may or may not be present.

*Menacing—*intentionally placing or attempting to place another person in fear of imminent serious physical injury.

*Reckless endangerment—*subjecting individuals to danger by recklessly engaging in conduct which creates substantial risk of serious physical injury.

*Robbery—*forcibly stealing another's property by use of threat of immediate physical force (e.g., The victim is present and aware of theft.).

*Sex offense—*public lewdness (i.e., exposure of sexual organs to others), sexual abuse by subjecting another to sexual contact without consent, deviant sexual act committed as in rape, (i.e., sexual intercourse without consent).

*Workplace violence—*any act or gesture intended to harass or intimidate another person; any act or gesture that damages or is likely to damage company property; or any act or gesture that leaves or is likely to leave another person injured or fearing injury.

# Hazard Assessment

Threat assessment analysts will periodically conduct a workplace violence hazard assessment/security analysis for each work area, and investigate each incidence of workplace violence. The analysts will review records, conduct a workplace security analysis (inspect work areas), conduct employee interviews, and distribute and collect the employee survey.

The most recent workplace violence hazard assessment for **[name]** was completed on **[date]**.

## Records Review

Threat assessment analysts **[will review/reviewed]** the following types of records to identify workplace violence risk factors at **[name]**:

**[Modify the list as applicable to your facility or operation.]**

* OSHA illness and injury logs and incident reports for the most recent 3 years
* Violence incident reports
* Records of or information compiled for recording of assault incidents or near assault incidents
* Documented reports of criminal or other violent incident trends in the industry or community
* Insurance records
* Police reports
* Accident investigations
* Training records
* Grievances
* Other relevant records or information

See Attachment **[number]** *Incident Report*, and Attachment **[number]** *Employee Security Survey* for copies of record forms.

## Workplace Security Analysis

Threat assessment analysts will periodically inspect the workplace and evaluate the work tasks of all employees to determine the presence of hazards, conditions, operations, and other situations that might place our workers at risk of occupational assault and other violent incidents. Employees will be periodically surveyed to identify the potential for violent incidents and to identify the need for improved security measures. These surveys will be conducted at least once within a two-year period, and more often as determined by **[name].**

The following potential hazards were identified during the inspections and employee surveys:

* **[insert issue description]**
* **[next issue]**

## Violence Risk Factors

Following are the risk factors found during the records review and security analysis that may place certain employees at greater risk of violence.

**Table [name]**

**Risk Factors**

**[The sample entries are for illustration only; modify as applicable to your facility.]**

|  |  |  |
| --- | --- | --- |
| **Risk Factor** | **Job Title Affected** | **Potential Violent Act or Condition** |
| Staff shortage | Nurses aid | Transporting unstable patients. |
| High crime area | All | Assault in the parking lot late at night. |
| Valuable goods | Guard |  |
| Work with public |  |  |
| Unstable person(s) |  |  |
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|  |  |  |

# Plan Implementation

Specific workplace controls and response measures will be implemented at **[name of facility, floor(s), work area]** in order to reduce the risk of workplace violence and injury to workers at **[name]**.

## Engineering Controls

Table **[number]** contains the list of engineering controls that **[will be/have been]** installed in all work areas designed to reduce or eliminate the risk factors for workplace violence.

**[Modify the following table as applicable to your facility.]**

**Table [number]**

**Engineering Controls**

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk Factor** | **Work Area** | **Control** | **Control Procedure** |
| High crime | Parking lot | Improve visibility | Install high-intensity lighting for the lot at the north exit. |
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## Administrative and Work Control Practices

Management has instituted several workplace violence control practices as a result of the workplace hazard assessment and recommendations made by **[name, or threat assessment analysts]**.

**[Several work control practices for workplace violence prevention, including alarm systems and awareness of the signs of violence, are included with this Plan. Insert the specific policy(ies) that apply to your workplace situation here, or refer to them as attachments, and modify them as applicable to your needs. See the list of Attachments at the end of this Plan.]**

## Incident Response

It is the responsibility of all employees and other personnel conducting business on **[name]** property to conduct themselves in a way that will contribute to an environment that is free of violence, intimidation, and threat. No one will be subjected to reprisal, retaliation, or disciplinary action for reporting acts pursuant to these guidelines.

### Initial Response Procedure

Following are standard operating procedures that employees and other persons on **[name]** property will follow in the event that they have knowledge of, witnessed, or are subject to assault, robbery, or other incidence of workplace violence:

1. Immediately report any situation or incident that generates a sense of fear for personal safety or the safety of others to the police.
2. If the reporting individual is an employee of **[name]**, the incident will also be reported to his or her supervisor or Human Resources as soon as possible. If the reporting individual is not an employee, he or she will also report the incident to **[name]**.
3. The supervisor or Human Resources staff will immediately provide the reporting individual with a copy of the Incident Report and ask himor her to complete it, and also notify **[name or a threat assessment analyst]**.

### Response Procedure for Injured Person(s)

Following are standard operating procedures for responding to a violent act where one or more persons are injured:

1. Anyone involved in a violent attack or who witnesses an attack resulting in an injury that requires more than first aid will contact emergency services.
2. Injured persons will receive prompt and appropriate medical care. The injured will be transported to medical care facilities.
3. The incident will be reported to police and other authorities as required by law.
4. The area where the violent actions occurred will be secured to protect evidence and minimize any disturbance during the post-incident response process.
5. An Incident Report will be prepared.
6. Injured persons, witnesses to the incident, and other affected employees will be provided psychological assistance and counseling to reduce trauma and stress.

## Incident Reporting

All incidents must be reported immediately to **[name]**. 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 **[name]**. See Attachment **[number]** for a copy of the Incident Report Form.

## Incident Investigation

Each incident will be evaluated by **[name, or the Threat Assessment Team]**. **[Name]** will submit a written evaluation of the incident to **[name]** and will make recommendations for revising the Plan to prevent similar incidents from occurring.

# Training

Workplace violence prevention training for all employees, including managers and supervisors was initially given on **[date]**.

## Employee Training

All new employees who have not previously received workplace violence prevention training at **[name]** facility will receive the general workplace violence training during employee orientation.

Initial employee training will include:

* A review and definition of workplace violence
* A full explanation and full description of the workplace violence prevention 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
* Information about how to identify potential workplace security hazards (e.g., inadequate lighting in the parking lot while leaving late at night, unknown person loitering outside the building)
* Review of measures that have been instituted at **[name]** 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

## Training for Supervisors, Managers, and Security Personnel

All management and security personnel will undergo training comparable to that for employee training, and additional training to enable them to recognize, analyze, and establish violence prevention controls. Such training will include measures to handle traumatized employees and other affected personnel with extra sensitivity.

**[The following optional subsection is designed for employees who participate in operations with some expectation for violence, such as emergency or mental health care, security, retail in high-crime areas, police, and similar activities.]**

## Specialized Training

Employees potentially exposed to hazards from workplace violence as part of their occupation will be given formal instruction on the specific hazards associated with their job or work area. This includes information on the types of injuries or problems identified in the facility, the policy and procedures contained in the overall safety program of the facility, those hazards unique to their job or work area, and the methods used by the facility to control the specific hazards. The training program will review risk factors that cause or contribute to assaults, etiology of violence and general characteristics of violent people, methods of controlling aberrant behavior, methods of protection, reporting procedures, and methods to obtain corrective action.

The following table lists the job titles that will be provided specialized training.

**Table [number]**

**Specialized Training Job Title List**

|  |  |  |  |
| --- | --- | --- | --- |
| **Job Title** | **Activity** | **Specialized Training** | **Date Trained** |
|  |  |  |  |
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See Attachment **[number]** for a copy of the training log.

## Refresher Training

Refresher training will be provided every 2 years or more frequently as determined by **[name]** on the basis of changes in policy or incidences of violence.

A general review of the training program will be conducted every 2 years. It will be updated to reflect any changes to this Plan.

## Training Records

All training records will be filed with employees’ records .

Records of training program contents, and the sign-in sheets of all attendees, will be maintained by **[name]** at **[location]** and be retained for **[duration].** The qualifications of the trainers will be maintained along with the training records.

# Recordkeeping

An accurate record of all workplace violence incidents will be maintained by **[name]** at **[location]**. All incident report forms will be kept for a minimum of **[duration]**.

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 appropriate OSHA 300 reporting forms. 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 **[name]**.

Minutes of the threat assessment analyst’s meetings will be kept for **[duration]**.

# Supporting Materials

**[*This product includes supporting materials, such as forms or attachments, which you may need to supplement your EHS plan. Please refer to the main menu on the CD for a complete list of supporting materials included with this product.*]**

Attachment **[number]**—Incident Report

Attachment **[number]**—Employee Security Survey

Attachment **[number]**—Emergency Contact Information List

Attachment **[number]**—Employee Individual Training Record

Attachment **[number]**—Workplace Violence Factors and Controls Checklist (retail establishments)