



PRISM

Public Risk Innovation,
Solutions, and Management

Workplace Violence: Hazard Assessment, Identification & Correction

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Note on Responsibility

The content of this class and the recommendations made do not necessarily include every possible loss potential, code violation, or good practice.



Learning Objectives

- Forming Homogeneous Workgroups
- How to Identify Workplace Violence Hazards
- Hazard Assessment Techniques
- Incorporating Hazard Mitigation into a WPV Prevention Plan

WPV Prevention Overview



The Why – SB553

- On September 30, 2023, California SB 553 was signed into law
- SB 553 amended California Labor Code section 6401.7 and created section 6401.9 and the new requirements in those Labor Code sections became effective and **enforceable on July 1, 2024.**
- SB 553 directs Cal/OSHA to develop a Workplace Violence Prevention Standard.

Future Regulatory Deadlines

- Cal/OSHA is currently working on developing a workplace violence prevention standard that meets the requirements of Labor Code section 6401.9 and will submit it to the Occupational Safety and Health Standards Board (OSHSB) no later than **December 31, 2025**.
- OSHSB is required to adopt the standard no later than **December 31, 2026**.

Workplace Violence Definition

- Any act of violence or threat that occurs in a place of employment
- Workplace violence includes, but is not limited to:
 - **The threat or use of physical force** against an employee that results in or has a high likelihood of resulting in injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
 - **An incident involving a threat or use of firearm or other dangerous weapon**, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The four types of workplace violence defined in Labor Code section 6401.9
 - *See Resource Packet for Categories of Workplace Violence*

Categories of Workplace Violence

Type 1: Violence by Strangers

- "Type 1 Violence" means workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.

Categories of Workplace Violence

Type 2: Violence by Customers or Clients

- "Type 2 violence" means workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

Categories of Workplace Violence

Type 3: Violence by Co-workers

- "Type 3 violence" means workplace violence against an employee by a present or former employee, supervisor, or manager. The primary target of a Type 3 event can be a co-employee, a supervisor, domestic partner, or manager of an individual who may be seeking revenge for what they perceive as unfair treatment at the workplace.

Categories of Workplace Violence

Type 4: Violence by Personal Relations

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

Categories of Workplace Violence

Multiple Types of Workplace Violence Events

- Most occupations and workplaces are at risk of more than one type of workplace violence event.

Key Components of WPPV Prevention Plan (SB 553)



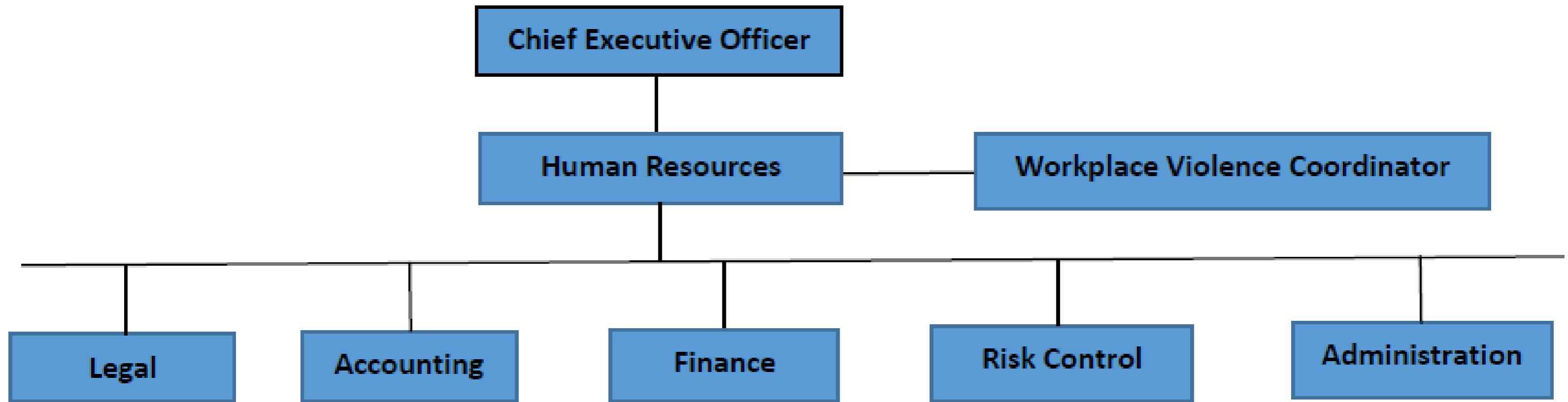
Workplace Violence Prevention Plan Includes

- **Identifying who is responsible for implementing the plan**
- Involving employees and their representatives
- Communicating with employees regarding workplace violence matters
- Accepting and responding to reports of workplace violence and prohibit employee retaliation
- Responding to actual and potential emergencies
- Developing and providing effective training
- **Identifying, evaluating, and correcting workplace violence hazards**
- Performing post incident response and investigations

WPV Prevention Roles and Responsibilities

- Plan Coordinator at the Organization Level
 - Global Oversight and Coordination
- Competent Person at Organization and/or Department Level
 - Cal/OSHA defines competent person as, “A person who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees. The competent person has the authority to impose prompt corrective measures to eliminate these hazards.”

WPV Organization Chart



Homogeneous Workgroups



Assessing WPV Hazards – What's The Process?

- Classify Homogeneous Workgroups
- Identify WPV Hazards Associated with Each Workgroup
- Assess WPV Hazards For Each Workgroup

Define “Homogeneous Workgroup”

- What workers do (**operations**) & where they do it (**environment**)
- Homogeneous Workgroups consists of:
 - Employees performing similar tasks in similar work environments
 - Hotel Clerk
 - Employees performing different but complementary tasks for a common outcome in the same work environment
 - Automobile Assembly Worker

Homogeneous Operations & Environments

Homogeneous Workgroup Operations Factors

- Like Tasks and Skills
- Direct Contact with Public
- Complementary Tasks for Common Objective

Homogeneous Operations & Environments

Homogeneous Workgroup Environment Factors

- Fixed Location (same building, office or cubicle)
- Variable Locations (worker must travel to perform task)
- Combination of Fixed and Variable Locations
- Similar Work Environment but Different Locations

Example: Homogeneous Workgroup

Workgroup (name): **Convenience Store Cashier**

Similar Operations (job description)

Direct public interaction

Point of sale transactions

Stock shelves

Custodial / Janitorial

Similar Environment (location)

24 hour operation

Similar products

Similar customers

Few Employees

Example: Homogeneous Workgroup

Workgroup (name): **Constructing a Building**

Common Operations (job description)

Different Tasks / Common Objective

- Framers
- Painters
- Plumbers
- Electricians

Same Environment (location)

Same Physical Location

Example: Homogeneous Workgroup

Workgroup (name): **Vehicle Accident First Responders**

Common Operations (job description)

Different Tasks / Common Objective

- Police Department
 - traffic control & accident investigation
- Fire Department
 - emergency medical services

Same Environment (location)

Same but variable physical location

Match PW Job with a Workgroup

Job Description

- Dispatcher / Scheduler
- Equipment Shop Assistant
- Water Department Counter Clerk
- Recyclable Waste Truck Drive
- Accounting/Office Staff
- Garbage Truck Drive
- Master Mechanic
- Landfill Cashier

Workgroup

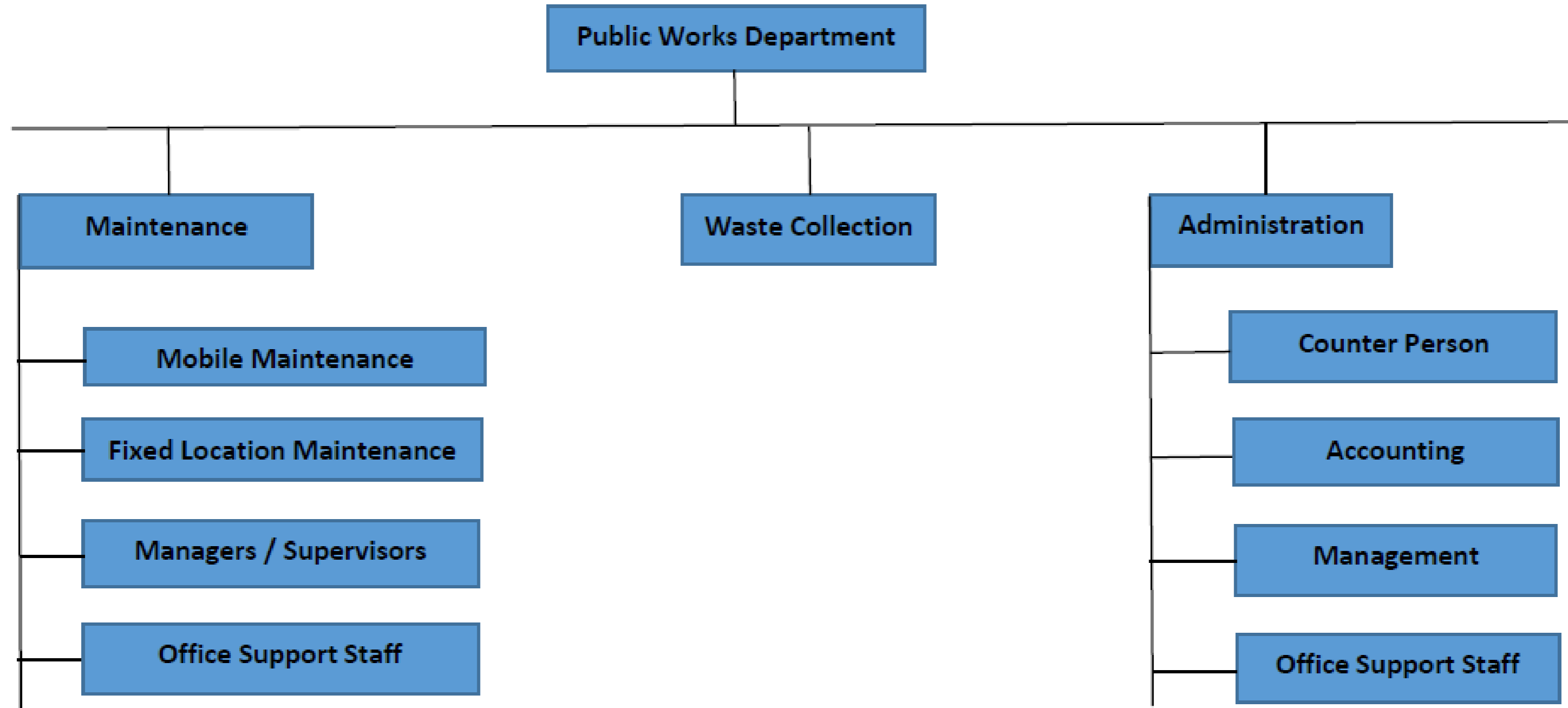
- Waste Collection
- Public Contact (counter person)
- Vehicle/Equipment Maintenance
- PW Administration

Drilldown to Workgroup Level

Organization

- Department
 - Workgroup

WPV Department Org. Chart



Group Activity

Establishing Workgroups



Establishing Workgroups

Group A

**Public Works Department – Water
Treatment and Delivery Operations**



Establishing Workgroups

Group B

Park and Recreation Department



Establishing Workgroups

Group C Human Resources Department



Establishing Workgroups

Group D Clerk / Recorder Department



Establishing Workgroups

Group E Health & Human Services Department



Establishing Workgroups

Group F

Elections & Voter Registration Department



Identifying Workplace Violence Hazards



Cal/OSHA FAQ: Multiple Worksites

Do I need a separate WPVPP for each worksite?

- Employers are required to ensure their WPVPP is specific to hazards and corrective measures for each work area and operation.

Ca/OSHA FAQ: Multiple Worksites

Do I need a separate WPVPP for each worksite?

- Depending on the nature of the different worksites, an individually tailored plan may be required. However, if multiple worksites share the same risks and hazards, the plans for such worksites can likely be similar.
- For instance, if an employer has a warehouse where it stores its merchandise that is not open to the public, and also has multiple retail stores that are open to the public, the plans between the worksites may have some similar elements, but ultimately, given the different risks and hazards each worksite poses, the plans will likely require a higher level of customization for each worksite.

What is a Risk Assessment

- Identifies Potential Hazards
 - Operational & Environmental factors, vulnerable areas
- Assessment of Risks
 - Likelihood vs. Severity
- Determine Control Measures
 - How do we mitigate or prevent the hazard

Categories of Workplace Violence

- **Type 1** = Committed by a person who has **no legitimate business** at the worksite, and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime
- **Type 2** = Directed at employees by **customers, clients, patients, students, inmates, or visitors**
- **Type 3** = Against an employee by a **present or former employee, supervisor, or manager**
- **Type 4** = Committed in the workplace by a person who does not work there, but has or is known to have had **personal relations** with an employee

*Includes threats resulting in injury, psychological trauma or stress

High Risk Workplace Operations & Environments

- Direct contact with public
 - Fixed location, constituents access to staff
- Exchange/handling of money
 - Petty cash, handling cash, making deposits
- Working in community based setting
 - Working on personal dwelling, traveling alone
- Working with unstable or volatile constituents
 - Providing services to those with potential psychological concerns
 - Constituents that are unpredictable
- High crime
 - Risk of assault, theft, and /or property damage

High Risk Workplace Operations & Environments

- Mobile workplace
 - Vehicle is office
 - In remote/unknown areas
 - Constituent access to worker in and out of vehicle
- Working alone or in small numbers
 - Fixed location limited access to communication tools
 - High potential for assault or crime
 - Isolated areas away from others
 - Remote worksite with constituent access
- Securing or protecting goods
 - Presence of valuable portable goods such as vehicles or electronics
 - Intervene in a situation to prevent theft or loss
 - Patrolling alone at night (isolated areas)

High Risk Workplace Operations & Environments

- Transporting constituents or goods
 - High-density traffic routes
 - Road rage
 - Limited/no communication tools
 - Constituent has physical access
 - Fare collection and enforcement
 - Exposure to theft of goods being transferred



Conducting a Risk Assessment



Identify Risk Factors

Identify potential sources of workplace violence

- Consider:
 - Interactions with constituents
 - Cash handling
 - High-stress / High-traffic areas
 - Limited visibility
 - Employee skill set
 - Public access
 - Time of day
 - Staffing shortages



Interior Considerations

- Entrances & exits
 - Door locks, access control systems
- Reception and lobby areas
 - Visibility, security personnel or other security measures
- Workspaces & offices
 - Inadequate lighting, blocked exits, visibility
- Common areas
 - Door locks, access control systems
- Hallways & corridors
 - Lighting, access control
- Communication systems - do they work in all spaces?

Exterior Considerations

- Building entrances & exits
 - Well-lit, visibility, clear signage
- Parking lots & structures
 - Lighting, visibility, free of hiding spots
- Perimeter of facility
 - Unauthorized access points
- Landscaping & outdoor structures
 - Hiding spots, concealment, or obstructions
- Trash receptacles
 - Unauthorized tampering
- Security measures
 - Are we capturing the right things?



Hazard Assessment Checklist

Risk Factors for WPV

- Contact with the public
- Working alone
- High crime rate
- Public safety function – conflicts
- Interact with known or suspected history of violence
- Employee history of red flags

Inspecting Work Areas

- Identification, badges
- Security personnel
- Barriers in place
- Area free of potentially harmful objects
- Communication channels

Sample Checklist

WORKPLACE VIOLENCE PREVENTION ENVIRONMENTAL HAZARD ASSESSMENT & CONTROL CHECKLIST

This checklist can help you or your workplace violence/crime prevention committee evaluate the workplace and job tasks to see what situations may place employees at risk. It is not confined to a single industry or occupation but can be used for any workplace. Adapt the checklist to fit your own needs. It is very comprehensive and not every question will apply to your workplace, write "N/A" in the NOTES column. Add any other questions you think are important.

1. RISK FACTORS FOR WORKPLACE VIOLENCE

Cal/OSHA and NIOSH have identified the following risk factors that may contribute to violence in the workplace. If you have one or more of these risk factors in your workplace, there may be a potential for violence. Weigh the risk and discuss with your management feasible and sustainable implementation practices to protect workers as necessary.

	YES	NO		NOTES/FOLLOW-UP ACTION
1.1			Do employees have contact with the public?	
1.2			Do they exchange money with the public?	
1.3			Do they work with, guard, or transport valuable items like money, jewelry, or other property?	

Example: Homogeneous Workgroup

Workgroup (name): **Convenience Store Cashier**

Similar Operations (job description)

Direct public interaction

Point of sale transactions

Stock shelves

Custodial / Janitorial

Similar Environment (location)

24 hour operation

Similar products

Similar customers

Few Employees

Example: Identifying Risk Factors

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Few Employees

Public interaction, the presence of valuables (money/merchandise), few coworkers, and off-hours operations with minimal customers place convenience store cashiers at risk for Type 1 and 2 workplace violence.

Example: Homogeneous Workgroup

Workgroup (name): **Constructing a Building**

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Different Tasks / Common Objective

- Framers
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Example: Identifying Risk Factors

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Same Physical Location

- Framers
- Painters
- Plumbers
- Electricians

Minimal tool & materials security at busy construction site creates opportunity for theft and thus potential for Type 1 WPV. Also, with demanding schedules, multiple tradespersons are competing for access to the same workspaces, which places construction workers at risk for Type 3 workplace violence.

Group Activity – Identifying Risk Factors

Work together and identify risk factors associated with each of the four (4) workgroups listed in the previous group activity.

- Direct contact with constituents
- Exchange /handling of money
- Working in community-based settings
- Working with unstable or volatile constituents
- High crime area
- Mobile workplace
- Working alone or in small numbers
- Securing or protecting goods
- Transporting people or goods

One person from each group will share their findings

Identifying Risk Factors

Group A

**Public Works Department – Water
Treatment and Delivery Operations**



Identifying Risk Factors

Group B Park and Recreation Departments



Identifying Risk Factors

Group C Human Resources Department



Identifying Risk Factors

Group D Clerk / Recorder Department



Identifying Risk Factors

Group E

Health & Human Services Department



Identifying Risk Factors

Group F

Elections & Voter Registration Department



Ranking Identified Hazards



Assessing Risk

- Historical Data - Looking back to look forward
 - Accident investigations
 - Incident reports
- Staff surveys or general assessments
- Focus groups
- Existing policies and procedures
- Severity & frequency of occurrence



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Risk Assessment Matrix

		SEVERITY		
		Low	Moderate	High
Likelihood or frequency of occurrence	Likely/ Frequent	Moderate Risk	High Risk	High Risk
	Possible/ Occasional	Low Risk	Moderate Risk	High Risk
	Unlikely/ Rare	Low Risk	Low Risk	Moderate Risk

Group Activity

Assessing Risk Factors



Group Activity - Assessing Risk Factors

Work together and assess Risk Factors associated with each of the four (4) workgroups listed in the previous group activity.

Use the Risk Assessment Matrix to assign a Frequency and Severity rating to a Risk Factor, and then combined frequency and severity ratings to determine where the Risk Factor should be placed on the Risk Assessment Chart. Repeat this process for each Risk Factor.

One person from each group will share their findings

Assessing Risk Factors

Group A

Public Works Department – Water Treatment and Delivery Operations



Assessing Risk Factors

Group B Park and Recreation Department



Assessing Risk Factors

Group C Human Resources Department



Assessing Risk Factors

Group D Clerk / Recorder Department



Assessing Risk Factors

Group E

Health & Human Services Department



Assessing Risk Factors

Group F

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Mitigation Strategies

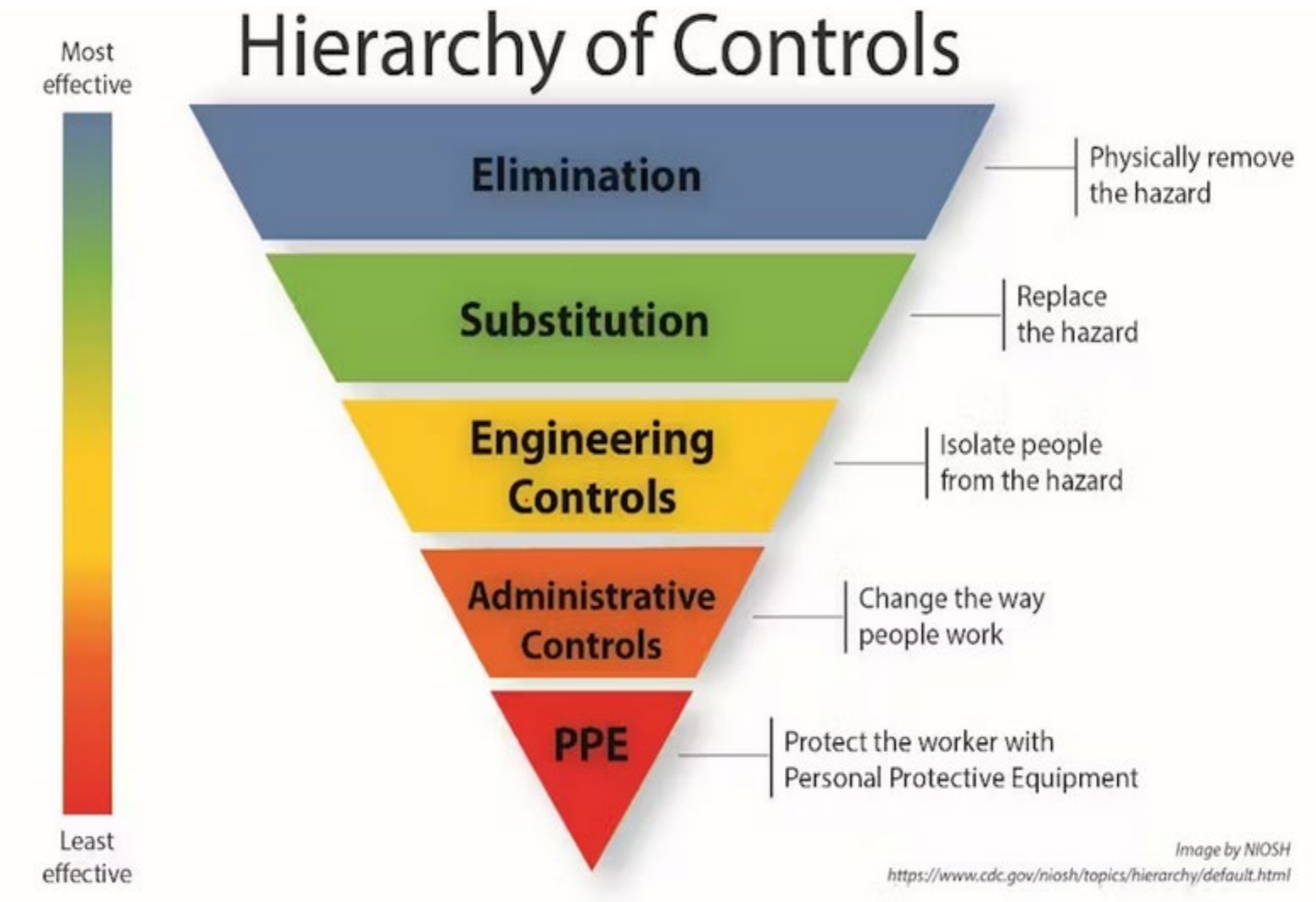


WPV Hazard Mitigation

Establish a Risk Mitigation Policy

- What level of risk dictates action?
- Prioritize Response Actions
 - Immediately correct actionable issues
 - Plan and budget for more complex matters

Hierarchy of Controls



Elimination

Physically remove the hazard

- Termination over the phone
- No employees alone after-hours



Substitution

Replacing hazard with less hazardous option

- Virtual meetings instead of in-person
- Meeting at county facility instead of constituent's home
- Meeting in visible area instead of closed office
- Minimize cash transactions



Engineering Controls

Isolation from hazard

- Locked doors
- Controlling access
 - Entry barriers (partitions), business hours
- Security presence
- Lighting



Administrative Controls

Change the way employees work

- Policies
- Procedures
- Training Programs
 - Conflict resolution
 - De-escalation
 - Understanding roles & responsibilities



Personal Protective Equipment (PPE)



Last resort – least effective



Additional Considerations



Continuous Improvement

Regularly review WPVPP

- At least annually
- When a deficiency is observed or becomes apparent
- After a workplace violence incident
- As needed – new hazard



Employee & Representative Involvement

- Identification of WPV hazards or concerns
 - Daily activities at risk
 - Facility layout
 - Recommendations for corrective actions
- Discussions of recent incidents
 - How to improve policies and procedures
 - Ability to report (complaints & suggestions)
- Following safety procedures
 - Are they practical

Employee Survey on Workplace Violence Hazard Assessment

Name (Optional):

Department/Unit:

Date:

Work Location (if at alternate worksite):

Please assess your department/unit over the last year. Write T, F, or N/A

Management Committee and Employee Involvement	T	F
1. Violence/threats are not accepted as "part of the job" by managers, supervisors, and/or employees.		
2. Employees communicate information about potentially assaultive/threatening clients or visitors to appropriate staff.		
3. Management communicates information to employees about incidents of workplace violence.		

Why Keep Records?

- SB 553 requirement
- Evidence of due diligence and adherence to regulatory requirements
- Historical data - enables continuous improvement
 - Analyzing trends
 - Areas for improvement
 - Impact of hazard correction



Scenario

Employee A, who works in the finance department, has recently confided in a coworker (Employee B) about experiencing domestic violence at the hands of their intimate partner. Despite efforts to keep the situation private, the abusive partner has begun showing up at the workplace, making threats, and causing disruptions.

How would we handle this scenario?

Questions?

