



Workplace Violence Prevention Plan (WVPP) Policy and Template

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PURPOSE

The purpose of the Workplace Violence Prevention Plan (WVPP) is to have a clearly understood, accessible, and actionable policy to respond quickly to episodes of workplace violence. The WVPP complements the existing CCSF anti-violence policies¹ by laying out more specifically the steps to identify, report, track, and analyze violent incidents to reduce the likelihood of re-occurrence.

BACKGROUND – CALIFORNIA SENATE BILL 553

California Senate Bill 553 (SB 553) requires California workplaces to have a policy in place to address the rising episodes of violence occurring at the worksite. SB 553 has multiple requirements of an employer which can be broadly grouped into two categories: pre-violent incident activities² and post-violent incident activities³. The details of both categories are presented in greater detail in the following WVPP. Further resources in addition to the requirements of SB 553 can be found in the accompanying [WVPP Resource Guide](#).

GOAL OF THE WORKPLACE VIOLENCE PREVENTION PLAN

The goal of establishing a Workplace Violence Prevention Plan is to reduce violent incidents in the workplace at all City and County of San Francisco (CCSF) work sites. Ultimately, this will be achieved through improved employee awareness, violent incident identification and reporting, tracking of violent incidents, and corrective actions when hazards are recognized.

To support a consistent approach across all CCSF departments, the Department of Human Resources (DHR) has created a WVPP Template⁴ for all departments to complete (or to adapt based on operational needs of a department), which includes all the elements required by SB 553.

¹ Existing Policy Prohibiting Employee Violence in the Workplace: *The City is committed to maintaining a workplace free from violence and threats of violence and has a zero-tolerance policy for workplace violence. CCSF will not condone any acts or threats of violence by a City employee or former employee against any other employee in or about facilities or elsewhere. Employees are also prohibited from possessing, storing, or having control of any weapon on the job, except when required by City department in the performance of the employee's official duties. Weapons include, but are not limited to, firearms, knives or weapons defined in the California Penal Code Section 12020.*

² Pre-violent incident activities include all employee education and training with awareness as to how to recognize a violent incident, how to elevate an issue, and ongoing communication with employees on workplace violence.

³ Post-violent incident activities include completion of a violent incident report by the supervisor, completion of an incident investigation by the Departmental Personnel Officer (DPO or Human Resources (HR) professional), completion of a violent incident log, and ongoing evaluation of incidents with issue identification and hazard correction.

⁴ The design of the WVPP and associated template was done in collaboration with CCSF health and safety professionals and in collaboration with our labor partners.

WORKPLACE VIOLENCE DEFINITIONS

Although there are different definitions and/or interpretations of “violence,” for purposes of reporting and analyzing events, the Workplace Violence definitions as set forth in SB 553 are included below and are used consistently throughout training and reporting materials.

- **Type I. Violence by Strangers**
Example: DPW street cleaner assaulted by Stranger while sweeping up.
- **Type II. Violence by Customers/Clients**
Example: Transit operators being assaulted by a customer/client.
- **Type III. Violence by Current or Past Coworkers**
Example: Co-worker violence. Disgruntled employee returning to worksite to do harm.
- **Type IV. Violence by someone with Personal Relations with an Employee**
Example: Domestic abuse situations where partner comes to worksite to do harm.

Violence may include not only acts of violence but also threats to commit violence or do harm⁵. Workplace violence includes any conduct, verbal or physical, in-person or virtual, which causes another to reasonably fear for their own personal safety or that of their immediate family.

EDUCATION, TRAINING, AND COMMUNICATION

Education and Training

SB 553 requires all employees to complete an annual mandatory workplace violence training and instruction that is clear, understandable, and effective. DHR developed a training video for all city employees that includes an understanding of what a violent incident is, how to elevate for attention and help, and what the role of the supervisor is in completing a violent incident report. The city-wide training is meant to be a general overview and is not site-specific. Departments are expected to supplement the DHR training video for all city employees with site and/or role specific training and education.

Communication

Beyond the initial and annual training for all employees on WVPP, departments are expected to have ongoing effective communication with employees related to the topic of workplace violence. This can include reinforcing a culture that encourages reporting of violence incidents without fear of retaliation, addressing employee concerns around violence, and any post-event investigations yielding corrective actions that could reduce violent incidents. The vehicle of communication can be in-person, or virtual, and can include staff meetings, newsletters, town hall gatherings, or staff bulletins. These communications also serve to bring timely updates to employees when changes in processes have been identified after a violent incident investigation to prevent future episodes.

⁵ A “threat of violence” for purposes of a workplace violence prevention plan means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonable perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

Template Workplace Violence Prevention Plan (WVPP)

A. WORKPLACE VIOLENCE PREVENTION PLAN (WVPP)

Completed on [REDACTED]

Submitted to the Department of Human Resources (DHR) on [REDACTED]

Highlighted areas in the template are for departments to complete information specific to their employees and their worksite(s). Upon completion by the department, WVPP templates will be shared with DHR by April 15, 2024, by submitting directly to thr.citysafety@sfgov.org.

B. RESPONSIBILITIES

Plan Administrator and DPO

The WVPP administrator and/or the Departmental Personnel Officer (DPO) or Human Resources Professional, or Health and Safety Professional [REDACTED], has the authority and responsibility for implementing the provisions of this program for CCSF Department of [REDACTED].

Departments rarely work in isolation; thus, it is expected that the WVPP will be developed in collaboration with related departments such as CAT, Real Estate, ADM, Security, etc.

The WVPP administrator/DPO is responsible for investigating each incident, conducting post-incident analysis and corrective action determination, documenting the incident and findings in respective logs, and disseminating corrective actions and updates to the WVPP.

Departmental Support

Departmental-based Human Resources, Safety, and Emergency Planning and Security officers and staff who are also responsible for supporting and maintaining the WVPP are listed here: [REDACTED].

Departmental support staff are responsible for assisting management and the WVPP administrator in incident investigation, corrective action determination, and WVPP annual review and timely updates.

Management

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

As per the Injury and Illness Prevention Program (IIPP), managers and supervisors are responsible for providing a secure work environment for their staff, including the identification of security risks, staff training needs, the development and management of departmental security policies and procedures, and incident reporting, investigation, and follow up.

Supervisors are responsible for completing the Violent Incident Report with the affected employee before submitting to the DPO for investigation and violent incident log completion.

Employees

All employees and building occupants are responsible for reporting hazards and injury or illness incidents per the IIPP, including hazards and incidents related to workplace violence. The WVPP itself must be made available for employee access and review. It can be found posted on the Departmental website [redacted]. The completed Departmental WVPP is also posted on DHR Health and Safety Division page: <https://sfdhr.org/workplace-health-and-safety>.

C. EDUCATION, TRAINING, AND COMMUNICATION

Creating a workplace environment to both recognize and reduce workplace violence will take continuous education and recognition of diligent safety practices and behaviors that reduce hazards. Ongoing engagement with the WVPP by supervisors and staff can assist with plan compliance.

Education

For all employees, education includes a process to confirm annual completion of required CCSF DHR violent incident identification and reporting. This can include annual reports on employee completion performed by [redacted].

Departmental Supplemental Training

1. A review of site-specific emergency preparedness procedures (*link to materials; this may include many different locations, and each should be listed and linked to appropriate emergency plan.*) [redacted].
2. Site-specific violent incident trainings beyond what is covered in CCSF DHR trainings: (*list trainings with link to supplemental materials.*) [redacted].
3. Departmental-specific training for supervisors on the incident report (Addendum A), how to complete the report after an incident occurs, and the timelines for completion.

Communication

Departments will maintain ongoing open communications with employees about safety concerns and will review the WVPP at a high level with employees at least annually. Ongoing communications can be met via regularly scheduled meetings, newsletters, emails, or bulletins.

If changes are made in the WVPP after an incident analysis, these updates must be shared with employees in a timely manner.

For supervisors: supervisors need familiarity with the incident report (Addendum A) and should be provided with specific departmental training to review the incident report, how to complete it, and the timelines for completion. Supervisors are required to complete the Violent Incident Report with the affected employee before submitting it to the DPO for investigation and report completion. Supervisor training completed by [redacted] on [redacted].

D. EMPLOYEE OBLIGATIONS

Each CCSF employee is required to attend workplace violence training annually. Employees must feel comfortable identifying a violence issue and elevating it for attention and support. Employees, once aware of violence, are encouraged to report any threats or acts of workplace violence within 24 hours from time

of knowledge of the incident. Employees must be able to inform management about workplace hazards or threats of violence without fear of reprisal or adverse action.

Employees shall refer any questions regarding their rights and obligations under this policy to their immediate supervisor.

E. ELEVATION OF AN INCIDENT:

Appropriate elevation and response need to be determined at the time of the incident, whether it is an in-person event or a threat of future harm. With any incident, employee safety is of the highest importance. Elevation and response mechanisms can include the employee leaving the area, calling for help, or, with a more imminent threat, calling 9-1-1. The employee must share the specifics of the violent incident with a supervisor/manager or other leader.

The DPO may need to elevate the violent incident issue to their assigned Deputy City Attorney (DCA) at the City Attorney's Office (CAT) and should do so in an urgent manner. Together, departmental leadership and the CAT will determine appropriate next steps on a case-by-case basis.

Next steps could include seeking a restraining order (RO). ROs can be used both in response to a current violent incident and in prevention of a violent incident. In the setting of a credible threat of violence⁶, a RO may be used preventatively to avoid a violent incident. Credible threats of violence can result from a pattern of behavior, or from a one-time situation.

Effective 1/1/2025 employees may request their bargaining unit to seek an RO on their behalf.

F. VIOLENT INCIDENT REPORT:

The Violent Incident Report shall be completed by the individual's immediate supervisor. If the immediate supervisor is not available, the report shall be completed by the next level of management or the DPO. Prior to proceeding with any formal investigation, the management level supervisor shall report any incidents of threats or acts of physical violence to the DPO. The Violent Incident Report should be completed as quickly as possible while the details of the event are still current, ideally within 24 hours. The report is mainly data collection, so creating a culture and environment where an employee is comfortable coming forward to report a violent incident is crucial. If the incident is between an employee and their supervisor, the DPO must complete the report. The report template is Addendum A.

G. VIOLENT INCIDENT INVESTIGATION.

The DPO, or Designee are required to complete the incident investigation in a timely manner, such as within seven (7) calendar days. Addendum B includes the materials, questions, and required analysis. As required by SB 553, completed reports should be made available to the employee (and their bargaining unit) within 15 days from the date of the request.

Procedures for investigating workplace violent incidents may include the following:

- A visit to the incident scene as soon as possible.
- Interviews of threatened or injured workers and witnesses.

⁶ "Credible threat of violence" is a knowing and willful statement or course of conduct that would place a reasonable person in fear for his or her safety, or the safety of his or her immediate family, and that serves no legitimate purpose.

- Examination of the workplace for factors associated with workplace security, including any previous reports of inappropriate behavior by the perpetrator.
- Determination of the cause of the violent incident.

H. VIOLENT INCIDENT LOG COMPLETION.

Complete the incident log (Addendum C) with the details required, and forward to DHR (dhrcityofsafety@sfgov.org) after completion of the investigation. Identifying a record number (as shown with an example in addendum C) instead of employee names allows tracking while protecting confidentiality. The log and supporting materials should be audit ready.

I. POST INCIDENT REPORT AND ANALYSIS

The intent of the log is to identify trends and opportunities for further hazard reduction. The log should be reviewed by the DPO at least annually, or sooner if there are more frequent incidents of workplace violence. Per SB 553, the log data must be maintained for a minimum of 5 years.

J. WORKPLACE HAZARD CORRECTION

The ongoing reporting and tracking of violent incidents support identification of trends and the potential for hazard reduction or mitigation. Hazards that are identified with potential solutions will be addressed and implemented in a timely manner. If corrections are significant enough, they may require an update and modification to the current WVPP. Such updates to the WVPP must be brought to the attention of all employees in a timely manner.

K. COMPLIANCE

Departments will ensure that all workplace security policies and procedures are clearly communicated and understood by all affected workers. The Departmental WVPP will be made accessible on departmental intranet to allow further education. Managers and supervisors will enforce the rules fairly and uniformly.

Annual completion of education and training by all city employees is required to re-enforce best practices for violence prevention. All workers will follow all workplace security directives, policies, and procedures, and assist in maintaining a safe work environment.

Failure to comply with the Workplace Violence Prevention Plan (WVPP) and/or the policy prohibiting employee violence in the workplace may result in employee discipline up to and including termination as well as criminal prosecution.

L. RECORDKEEPING

SB 553 has several requirements of recordkeeping that must be followed. The documentation of completion of the annual training by all employees must be maintained for at least one year following the date of completion. The retention of violent incident reports and investigations must be maintained for five years following the year of incident. The violent incident logs must be maintained for at least five years following the year of incidents.

Records should be maintained, including workplace security and hazard assessments and inspections (including the person(s) or persons conducting the inspection), the workplace security concerns that have been identified, and the actions taken to correct the identified concerns.

M. ANNUAL WVPP REVIEW

Annual review of the WVPP includes confirming accessibility to the plan and assessing its effectiveness and overall employee compliance with the processes outlined in the WVPP. This includes updates and new procedures if improvements can be identified that would reduce workplace violent incidents. The whole plan should be reviewed at least annually or more often if there are violent incidents.



Addendum A – Violent Incident Report

Violent Incident-Report Instructions

The supervisor receiving a report of workplace violence must complete this form with as much detail as possible to support an investigation. The original report must be forwarded through all appropriate levels of supervision to the DPO and Department Head or their Designee. The department must maintain the original form. DHR will maintain a copy.

Employee Information

Reporting Employee: _____
Affected Employee(s): _____
Affected Employee(s) Job Title(s): _____
Department: _____
Facility Address: _____

Incident Information

Date incident occurred: _____
Time incident occurred: _____
Specific address and detailed description of description where incident occurred (i.e. empty hallway, warehouse bathroom):

Definitions of Violent Incident Types

- **Type I violence**: 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.
- **Type II violence**: workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- **Type III violence**: workplace violence against an employee by a present or former employee, supervisor, or manager.
- **Type IV violence**: 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.

Checklist of Questions to Answer After a Violent Incident

1. Which type of person threatened or assaulted the employee(s)?

Type I: Stranger Thief/Suspect Other

Type II: Client/Customer Passenger Person in Custody Patient Visitor

Type III: Current Co-worker Former Co-worker Supervisor/ Manager

Type IV: Current Spouse or Partner Former Spouse or Partner Employee’s Friend
 Employee’s Relative Family/friend of client or patient

2. What type of violent incident occurred (check all that apply)?

Verbally harassed Verbally Threatened Physically Assaulted Punched

Slapped Grabbed Pushed Choked Kicked Bitten

Hit with Object Threatened with Weapon Assaulted with Weapon Animal Attack

Other (Describe): _____

3. Was a weapon used? Yes No

Describe the incident:

4. Was/were the employee(s) working alone? Yes No

If not, who was/were with the employee(s) that may have witnessed the incident?

5. Were there threats made before the incident occurred? Yes No

If yes, was it ever reported to the employee’s supervisor or manager that the employee(s) was/were threatened, harassed, or was/were suspicious that the attacker may become violent?

6. Are you willing to testify against the Respondent in Court to obtain a restraining order?

Yes No

Reporter Information

Report Completed By: _____

Department/Job Title: _____

Date: _____ Phone number: _____

Email: _____



Addendum B – Violent Incident Investigation

The Department Head, DPO, or Designee will complete the investigation into the violent incident. Further investigation and resolution of the incident is expected within seven (7) days in addition to submitting a copy of the completed investigation to DHR.

Incident Analysis To be completed by DPO/ HR Professional:

Has this type of incident occurred before at the workplace? Yes No

What were the main factors that contributed to the incident?

What could have prevented or at least minimized the damage caused by this incident?

Post-Incident Response

- Yes No Did the employee(s) require medical attention as a result of the incident?
- Yes No Did the employee(s) miss work as a result of the incident?
- Yes No Did the employee(s) apply for workers’ compensation?
- Yes No Was security contacted?
- Yes No Was building facilities contacted?
- Yes No Was immediate counseling provided to affected workers and witnesses?
- Yes No Was critical incident debriefing provided to all affected staff who desired it?
- Yes No Was post-trauma counseling provided to affected staff who desired it?
- Yes No Was all counseling provided by a professional counselor?

Has there been follow-up with the Employee(s)? Yes No

Is this a recurring event? Yes No

Are there modifications to be made to WVPP to reflect updated practices? Yes No

Describe updates to WVPP _____

Investigation completed by: _____

Department/Job Title: _____

Date: _____ Phone number: _____

Email: _____



Addendum C – Violent Incident Log and Instructions

Every workplace violence incident is reported and recorded in a violent incident log. Any element of personal identifying information sufficient to allow identification of any person involved in a violent incident will **NOT** be recorded. Such personal identifying information includes the person’s name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, could reveal the person’s identity.

Upon receipt of report, DPO assigns a number system for tracking including date of report, Department, initials of who completed the log entry, without including employee name. Tracking and trending should include date, time and location, violence type, type of assault, and incident detailed description.

It is expected that the logs will be forwarded to DHR on a timely basis.

Departments are expected to review the data at least quarterly and make improvements to prevent further incidents.

Template Log is below:

Log #	Person who completed the Log	Incident Date	Incident Time (24-hour, military)	Physical Location	Violence Perpetrator(s) Type, e.g., I stranger; II: client; III: employee (current or former); IV: Personal relationship	Incident Type, e.g., Verbal threats, Physical attack	CAT Notified Y/N	Police Notified Y/N
Example: DHR12.13.23-1	Giano Bito	12/13/23	1403	1 S Van Ness, 4 th floor	III	Verbal	Y	Y