**HCI**

**INJURY & ILLNESS PREVENTION MODEL PROGRAM FOR WORKPLACE SECURITY**

This publication is not meant to be either a substitute for - or a legal interpretation of - the occupational safety and health standards. The reader is cautioned to refer directly to [Title 8 of the California Code of Regulations](http://www.dir.ca.gov/samples/Search/query.htm) for detailed and exact information, specifications, and exceptions.

***WHO SHOULD USE THIS MODEL PROGRAM?***

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| --- | --- |
| **NO ONE IS REQUIRED TO USE THIS MODEL PROGRAM.**  However, if you determine that workplace security hazards exist in your workplace, you may want to use some or all of this Model Program or develop your own program independently.  Many workplaces are at risk for workplace violence, but certain workplaces are recognized to be at significantly greater risk than others. Therefore, every employer should perform an initial assessment to identify workplace security issues. If the initial assessment determines that workers are at a significant risk for workplace violence then the employer should review the material presented in this Model Program.  There are a number of factors that have been shown to contribute to the risk of violence in the workplace. If you have one or more of the following factors at your workplace, then you should consider your workplace to be at potential risk of violence: | * Exchange of money. * Working alone at night and during early morning hours. * Availability of valued items, e.g., money and jewelry. * Guarding money or valuable property or possessions. * Performing public safety functions in the community. * Working with patients, clients, customers or students known or suspected to have a history of violence. * Workers with a history of assaults or who exhibit belligerent, intimidating and threatening behavior to others.   These are just some of the major factors that contribute to workplace violence. If you have identified any of these, or other indicators of violence in the workplace, then a further evaluation should be performed. |

***WORKPLACE VIOLENCE IN CALIFORNIA***

The circumstances associated with workplace violence in California can be divided into three major types. However, it is important to keep in mind that a particular occupation or workplace may be subject to more than one type.

**Type I** - In California, the majority of fatal workplace assaults involve a person entering a small late-night retail establishment, e.g., liquor store, gas station or a convenience food store, to commit a robbery. During the commission of the robbery, a worker, or more likely, the proprietor, is killed or injured.

Workers or proprietors who have face-to-face contact and exchange money with the public, who work late at night and into the early morning hours, and who often work alone or in very small numbers are at greatest risk of a Type I event. While the assailant may feign being a customer as a pretext to enter the establishment, he or she has no legitimate relationship to the workplace.

Retail robberies resulting in workplace assaults usually occur between late night and early morning hours and are most often armed robberies. In addition to workers who are classified as cashiers, many victims of late night retail violence are supervisors or proprietors who are attacked while locking up their establishment for the night or janitors who are assaulted while cleaning the establishment after it is closed.

Other occupations/workplaces may be at risk of a Type I event. For instance, assaults on taxicab drivers also involve a pattern similar to retail robberies. The attack is likely to involve an assailant pretending to be a bona fide passenger during the late night or early morning hours who enters the taxicab to rob the driver of his or her fare receipts. Type I events also involve assaults on security guards. It has been known for sometimes that security guards are at risk of assault when protecting valuable property that is the object of an armed robbery.

**Type II** - A Type II workplace violence event involves an assault or threat by someone who is either the recipient or the object of a service provided by the affected workplace or the victim. Type II events involve fatal or nonfatal injuries to individuals who provide services to the public. These events chiefly involve assaults on public safety and correctional personnel, municipal bus or railway drivers, health care and social service providers, teachers, sales personnel, and other public or private service sector workers who provide professional, public safety, administrative or business services to the public.

Law enforcement personnel are at risk of assault from the "object" of public safety services (suspicious persons, detainees, or arrestees) when making arrests, conducting drug raids, responding to calls involving robberies or domestic disputes, serving warrants and eviction notices and investigating suspicious vehicles. Similarly, correctional personnel are at risk of assault while guarding and transporting jail or prison inmates.

Of increasing concern, though, are Type II events involving assaults to the following types of service providers:

(1) Medical care providers in acute care hospitals, long-term care facilities, outpatient clinics and home health agencies;

(2) Mental health and psychiatric care providers in inpatient facilities, outpatient clinics, residential sites and home health agencies;

(3) Alcohol and drug treatment providers;

(4) Social welfare providers in unemployment offices, welfare eligibility offices, homeless shelters, probation offices and child welfare agencies;

(5) Teaching, administrative and support staff in schools where students have a history of violent behavior; and

(6) Other types of service providers, e.g., justice system personnel, customer service representatives and delivery personnel.

Unlike Type I events which often represent irregular occurrences in the life of any particular at-risk establishment, Type II events occur on a daily basis in many service establishments, and therefore represent a more pervasive risk for many service providers.

**Type III** - A Type III workplace violence event consists of an assault by an individual who has some employment-related involvement with the workplace. A Type III event usually involves a threat of violence, or a physical act of violence resulting in a fatal or nonfatal injury, by a current or former worker, supervisor or manager; a current or former spouse or lover; a relative or friend; or some other person who has a dispute involving an worker of the workplace.

Available data indicates that a Type III event is not associated with a specific type of workplace or occupation. Any workplace can be at risk of a Type III event. However, Type III events account for a much smaller proportion of fatal workplace injuries than Types I and II. Nevertheless, Type III fatalities often attract significant media attention and are perceived as more common than they actually are.

***INJURY AND ILLNESS PREVENTION PROGRAM  
FOR WORKPLACE SECURITY***

Our establishment's IIP Program for Workplace Security addresses the hazards known to be associated with the three major types of workplace violence. Type I workplace violence involves a violent act by an assailant with no legitimate relationship to the workplace who enters the workplace to commit a robbery or other criminal act. Type II involves a violent act or threat of violence by a recipient of a service provided by our establishment, such as a client, patient, customer, passenger or a criminal suspect or prisoner. Type III involves a violent act or threat of violence by a current or former worker, supervisor or manager, or another person who has some employment-related involvement with our establishment, such as a worker's spouse or lover, an worker's relative or friend, or another person who has a dispute with one of our workers.

*NOTE: No one is required to use this Model Program. However, if you determine that workplace security hazards exist in your workplace, you may want to use some or all of this Model Program or develop your own program independently.*

***RESPONSIBILITY***

We have decided to assign responsibility for security in our workplace. The IIP Program administrator for workplace security is **Chris Herron** and has the authority and responsibility for implementing the provisions of this program for **HCI**.

All managers and supervisors are responsible for implementing and maintaining this IIP Program in their work areas and for answering worker questions about the IIP Program. A copy of this IIP Program is available from each manager and supervisor.

***COMPLIANCE***

We have established the following policy to ensure compliance with our rules on workplace security.

Management of our establishment is committed to ensuring that all safety and health policies and procedures involving workplace security are clearly communicated and understood by all workers.

All workers 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. Our system of ensuring that all workers, including supervisors and managers, comply with work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include:

1. Informing workers, supervisors and managers of the provisions of our IIP Program for Workplace Security.
2. Evaluating the performance of all workers in complying with our establishment's workplace security measures.
3. Recognizing workers who perform work practices which promote security in the workplace.
4. Providing training and/or counseling to workers whose performance is deficient in complying with work practices designed to ensure workplace security.
5. Disciplining workers for failure to comply with workplace security practices.
6. The following practices that ensure worker compliance with workplace security directives, policies and procedures: Foreman and/or Supervisor will account for all personnel on the job.

***COMMUNICATION***

At our establishment, we recognize that to maintain a safe, healthy and secure workplace we must have open, two-way communication between all workers, including managers and supervisors, on all workplace safety, health and security issues. Our establishment has a communication system designed to encourage a continuous flow of safety, health and security information between management and our workers without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following checked items:

* New worker orientation on our establishment's workplace security policies, procedures and work practices.
* Periodic review of our IIP Program for Workplace Security with all personnel.
* Training programs designed to address specific aspects of workplace security unique to our establishment.
* Regularly scheduled safety meetings with all personnel that include workplace security discussions.
* A system to ensure that all workers, including managers and supervisors, understand the workplace security policies.
* Posted or distributed workplace security information.
* A system for workers to inform management about workplace security hazards or threats of violence.
* Procedures for protecting workers who report threats from retaliation by the person making the threats.
* Addressing security issues at our workplace security team meetings.
* Our establishment has fewer than ten workers and communicates with and instructs workers orally about general safe work practices with respect to workplace security.
* Other: **As HCI keeps personnel first, we make sure all employees, sub contractors and delivery personnel on the jobsite are accounted for and informed of our practices and commitment**.

***HAZARD ASSESSMENT***

We will be performing workplace hazard assessment for workplace security in the form of periodic inspections. Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence are performed by the following observer(s) in the following areas of our workplace:

|  |  |
| --- | --- |
| Observer | Area |
| |  |  | | --- | --- | | Chris Herron | Immediate work zones | | Foreman |  | | |

Periodic inspections are performed according to the following schedule:

1. Daily inspections are implemented at the beginning of each work day.
2. When we initially established our IIP Program for Workplace Security;
3. When new, previously unidentified security hazards are recognized;
4. When occupational injuries or threats of injury occur; and
5. Whenever workplace security conditions warrant an inspection.

Periodic inspections for security hazards consist of identification and evaluation of workplace security hazards and changes in worker work practices, and may require assessing for more than one type of workplace violence. Our establishment performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace security hazards.

**HCI has determined Type III Violence is the most likely risk to be encountered. As such, inspections for Type III workplace security hazards include assessing:**

1. How well our establishment's anti-violence policy has been communicated to workers, supervisors or managers.
2. How well our establishment's management and workers communicate with each other.
3. Our workers', supervisors' and managers' knowledge of the warning signs of potential workplace violence.
4. Access to, and freedom of movement within, the workplace by non-workers, including recently discharged workers or persons with whom one of our worker's is having a dispute.
5. Frequency and severity of worker reports of threats of physical or verbal abuse by managers, supervisors or other workers.
6. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
7. Worker disciplinary and discharge procedures.
8. Other: We will continue to review and present current methods which will provide additional security to our personnel and work location.

***INCIDENT INVESTIGATIONS***

We have established the following policy for investigating incidents of workplace violence.

Our procedures for investigating incidents of workplace violence, which includes threats and physical injury, include:

1. Reviewing all previous incidents.
2. Visiting the scene of an incident as soon as possible.
3. Interviewing threatened or injured workers and witnesses.
4. Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
5. Determining the cause of the incident.
6. Taking corrective action to prevent the incident from recurring.
7. Recording the findings and corrective actions taken.
8. Other: Seek outside sources for guidance dependent upon severity.

***HAZARD CORRECTION***

Hazards which threaten the security of workers shall be corrected in a timely manner based on severity when they are first observed or discovered.

Corrective measures for Type III workplace security hazards include:

1. Effectively communicating our establishment's anti-violence policy to all workers, supervisors or managers.
2. Improving how well our establishment's management and workers communicate with each other.
3. Increasing awareness by workers, supervisors and managers of the warning signs of potential workplace violence.
4. Controlling access to, and freedom of movement within, the workplace by non-workers, including recently discharged workers or persons with whom one of our worker's is having a dispute.
5. Providing counseling to workers, supervisors or managers who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of co-workers.
6. Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
7. Ensure that worker disciplinary and discharge procedures address the potential for workplace violence.
8. Other: Utilize outside 3rd party resources to discuss all situations of such nature

***TRAINING AND INSTRUCTION***

We have established the following policy on training all workers with respect to workplace security.

All workers, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the IIP Program for Workplace Security is first established and periodically thereafter. Training shall also be provided to all new workers and to other workers for whom training has not previously been provided and to all workers, supervisors and managers given new job assignments for which specific workplace security training for that job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards.

General workplace security training and instruction includes, but is not limited to, the following:

1. Explanation of the IIP Program for Workplace Security including measures for reporting any violent acts or threats of violence.
2. Recognition of workplace security hazards including the risk factors associated with the three types of workplace violence.
3. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
4. Ways to defuse hostile or threatening situations.
5. Measures to summon others for assistance.
6. Worker routes of escape.
7. Notification of law enforcement authorities when a criminal act may have occurred.
8. Emergency medical care provided in the event of any violent act upon an worker; and
9. Post-event trauma counseling for those workers desiring such assistance.

In addition, we provide specific instructions to all workers regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

We have chosen the following checked items for Type III training and instruction for managers, supervisors and workers:

\_\_Pre-employment screening practices.  
\_\_Worker Assistance Programs.  
\_\_Awareness of situational indicators that lead to violent acts.  
\_\_Managing with respect and consideration for worker well-being.  
\_\_Review of anti-violence policy and procedures.  
\_\_Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
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