



# San Francisco Residential Rent Stabilization and Arbitration Board

## RNT Workplace Violence Prevention Plan (WVPP)

### A. WORKPLACE VIOLENCE PREVENTION PLAN (WVPP)

**PURPOSE:** To reduce and respond quickly to acts of aggressive, threatening behavior and violence in the workplace.

**SCOPE:** This plan applies to all Residential Rent Stabilization and Arbitration Board (RNT) employees in its entirety.

Completed on **April 12, 2024.**

Submitted to the Department of Human Resources (DHR) on **April 12, 2024.**

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 [dhrr.citysafety@sfgov.org](mailto:dhrr.citysafety@sfgov.org).

### WORKPLACE VIOLENCE DEFINITIONS

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**

This is violence committed by an assailant who has no legitimate business relationship with the City and usually enters the affected workplace to commit a destructive or other criminal act. Example: RNT employee assaulted by Stranger during outreach to the public.

- **Type II. Violence by Customers/Clients**

This is violence committed by an assailant who either receives services from or is under the custodial supervision of the City. Example: RNT Public Information Unit employees being assaulted by a customer/client at the front counter.

- **Type III. Violence by Current or Past Coworkers**

This involves violence by an assailant who has some work-related involvement with the City; for example, a current or former employee, supervisor, or manager. Example: Co-worker violence. Disgruntled employee returning to worksite to do harm.

- **Type IV. Violence by someone with Personal Relations with an Employee**

This includes incidents of violence at the workplace by an assailant who confronts an individual with whom he or she has or had a personal relationship outside of work. Personal relations include a current or former spouse, family member, friend, or acquaintance. 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 harm<sup>1</sup>. 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.

## **B. RESPONSIBILITIES**

### **Department Personnel Officer**

The WVPP administrator, **Departmental Personnel Officer (DPO) Stella Choi (or her successor)**, has the authority and responsibility for implementing the provisions of this program for CCSF Department of RNT.

The WVPP 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 below:

#### **RNT Staff:**

**Executive Director: Christina Varner**

**Deputy Director: Barbara Texidor**

### **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 is available for employee access and review. It can be found posted on the Departmental website <https://sf.gov/rentboard>. The completed Departmental WVPP is also

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<sup>1</sup> A "threat of violence" 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 reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

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.

All employees, including managers and supervisors, will have training and instruction on general and job-specific safe workplace security practices. Training on risk factors associated with workplace violence and proper handling of emergency situations will be provided to employees to minimize the risks of violent incidents occurring in the workplace.

### **Education**

All employees must complete the DHR training video 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. RNT will confirm annual completion of the required CCSF DHR violent incident identification and reporting training through a report created by the DPO Stella Choi.

### **Departmental Training**

RNT provides the following workplace health and safety training topics to its employees:

1. A review of site-specific emergency preparedness procedures:
  - 1) Injury and Illness Prevention Program (IIPP)
    - Explanation of the IIPP for workplace security including measures for reporting injuries, violent acts, or threats of violence.
  - 2) COVID-19 Prevention Plan
    - Overview of CCSF policy regarding COVID-19 positive cases, quarantine, and reporting responsibilities.
  - 3) Facility Access and Control
    - Tour of worksite and Smart Badge creation during onboarding.
  - 4) Emergency and Evacuation Plan
    - Explanation of RNT Emergency and Evacuation Plan and introduction to floor wardens responsible for employee evacuation.
  - 5) Types of Violence at the Workplace
    - Recognition of workplace security hazards including the risk factors associated with different types of workplace violence.
    - Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
    - Training for supervisors on the WVPP incident report (Addendum A), how to complete the report after an incident occurs, and the timelines for completion.

**6) Calling for Fire/Rescue/Medical Services**

- Training on methods to seek emergency medical care in the event of any violent act upon an employee.
- Notification of security and law enforcement authorities when a criminal act may have occurred.
- Post-event trauma counseling for employees desiring such assistance.

**7) Personal/Lone Employee Safety**

- Self-awareness training.
- Training on ways to diffuse hostile or threatening situations.

**8) Active Shooter**

- Overview of protocols in place to respond to an active shooter.
- Training on measures to summon others for assistance.

**9) Evacuation/Shelter in Place/Earthquake Preparedness/Severe Weather**

- Training on employee routes of escape.
- Explanation of how to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
- Explanation of when to report to work or evacuate during the workday.

**2. Site-specific violent incident trainings beyond what is covered in CCSF DHR trainings:**

Violence Type I training and instruction for all RNT employees:

- Crime awareness.
- Self-awareness.
- Self-protection.
- Communication and de-escalation techniques.
- Determination of when to use the "buddy" system or other assistance from co-workers
- Proper work practices for specific workplace activities, occupations, or assignments, such as public contact employees conducting outreach.
- Review of referral process for Employee Assistance Program.

Violence Type II training and instruction for all RNT employees:

- Self-awareness.
- Self-protection.
- Dealing with angry, hostile, or threatening individuals.
- Location, operation, care, and maintenance of alarm systems and other protective devices.
- Communication and de-escalation techniques.
- Determination of when to use the "buddy" system or other assistance from co-workers.
- Awareness of indicators that may lead to violent acts by clients/customers.
- Review of referral process for Employee Assistance Program.

Violence Type III training and instruction for all RNT employees:

- Self-awareness.

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- Self-protection.
- Communication and de-escalation techniques.
- Preemployment screening practices.
- 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.
- Review of referral process for Employee Assistance Program.

Violence Type IV training and instruction for all RNT employees:

- Self-awareness.
- Awareness of situational indicators that lead to violent acts.
- Awareness of the signs of potential unrecognized interpersonal violence.
- Managing with respect and consideration for worker well-being.
- Review of anti-violence policy and procedures.
- Review of referral process for Employee Assistance Program.

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

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.

Training materials can be found here:

- Department General Teams Channel files.
- Department SharePoint Files such as <https://sfgov1.sharepoint.com/sites/RNT-Department/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FRNT%2DDepartment%2FShared%20Documents%2FGeneral%2FGeneral%20Docs&viewid=1a3187a4%2D4070%2D42b3%2D987a%2De201d3351070>.

## **Communication**

RNT will maintain ongoing open communications with employees about safety concerns and will review the WVPP at a high level with employees annually. Ongoing communications designed to facilitate a continuous flow of workplace security information between management and employees in a form that is readily understandable by all affected employees consists of one or more of the following:

- New employee orientation including workplace security policies and procedures.
- Review of the Departmental WVPP.
- Workplace security training programs.
- Regularly scheduled meetings.
- Effective communication between employees and supervisors about security and violence concerns, including translation where appropriate.
- Posted or distributed workplace security information.

- A system for employees to anonymously inform management about workplace security and violence concerns.
- A system for employees to inform management about workplace security hazards or threats of violence without fear of reprisal or adverse action.

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 are provided with specific departmental training to review the incident report, how to complete the incident report, 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. Initial Incident Report training was completed by Barbara Texidor for Christina Varner, Joey Koomas, Connie Brandon, Catherine Xu, Jennifer Rakowski and Amir Omidvari on March 19, 2024, and for Lennie Gragasin and Nancy Marquez on April 8, 2024 and will occur annually thereafter.

All RNT employees have the right to examine and receive a copy of RNT's WVPP. This will be accomplished by providing unobstructed access through a CCSF server or website, which allows an employee to review, print, and email the current version of the WVPP.

Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or co-employees.

## D. EMPLOYEE OBLIGATIONS

Each employee and every person on City and County of San Francisco (CCSF) property is encouraged to report incidents of threats or acts of physical violence. In cases where the reporting individual is not a CCSF employee, the report should be made to the San Francisco Police Department and/or the appropriate law enforcement agency who has jurisdiction over the offense alleged to have been committed.

In cases where the reporting individual is a CCSF employee, the report shall be made to the reporting individual's immediate supervisor. If the immediate supervisor is not available, the report shall be made to another available supervisor or manager or to the Departmental Personnel Officer (DPO). Prior to proceeding with any formal investigation, the management level supervisor shall report the incidents of threats or acts of physical violence to the DPO.

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 (including Managers and Supervisors) are responsible for:

- their own behavior by interacting responsibly with fellow employees, supervisors, and clients;



- being familiar with Department policy regarding workplace violence;
- promptly reporting actual and/or potential acts of violence to appropriate authorities;
- cooperating fully in investigations/assessments of allegations of workplace violence;
- being familiar with the service provided by the Employee Assistance Program; and
- informing appropriate personnel about restraining or protective court orders related to domestic/interpersonal situations so that assistance can be offered at the work site.

Managers and Supervisors are additionally responsible for:

- informing employees of the Department's workplace violence policy and program;
- taking all reported incidents of workplace violence seriously;
- investigating all acts of violence, threats, and similar disruptive behavior in a timely fashion and taking the necessary action(s);
- providing feedback to employees regarding the outcome of their reports regarding violent or potentially violent incidents;
- requesting, where appropriate, assistance from functional area expert(s);
- being cognizant of situations that have the potential to produce violent behavior and promptly addressing them with all concerned parties;
- encouraging employees who show signs of stress or evidence of possible domestic violence to seek assistance, such as the Employee Assistance Program; and
- assuring, where needed, that employees have time and opportunity to attend training, e.g., conflict resolution, stress management, etc.

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 needs 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 or manager.

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 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 violence<sup>2</sup>, 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.

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<sup>2</sup> "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.

## **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, 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 include the following:

- A visit to the incident scene as soon as possible.
- Interviews of threatened or injured employees and witnesses.
- Examination of the workplace for factors associated with workplace security, including any previous reports of inappropriate behavior by the perpetrator.
- Determining the cause of the incident.
- Taking corrective action to prevent the incident from reoccurring.
- Recording the findings and corrective actions taken.

The written incident report will include the date, time, location, description of the type of the event and circumstances leading up to it, as well as the identity of the persons involved.

## **H. VIOLENT INCIDENT LOG COMPLETION**

Complete the incident log (Addendum C) with the details required and forward it to DHR ([dhrcitysafety@sfgov.org](mailto:dhrcitysafety@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 SECURITY HAZARD ASSESSMENT AND CORRECTION**

The RNT Department has the following locations and physical addresses:

- 25 Van Ness Avenue Suite 320
- 25 Van Ness Avenue Suite 340

Periodic inspections and reviews to identify and evaluate workplace security and violence hazards will be performed by the following competent observer(s) in RNT's workplace:

1. Christina Varner
2. Barbara Texidor
3. Joey Koomas
4. Connie Brandon
5. Jennifer Rakowski
6. Catherine Xu
7. Amir Omidvari

Periodic inspections and reviews by RNT observers are performed according to the following schedule:

1. Bi-annually.
2. When the Department initially established its WVPP.
3. When new workplace security hazards are introduced into the workplace.
4. When new, previously unidentified workplace security hazards are recognized.
5. When workplace security incidents occur.
6. When RNT hires and/or reassigns permanent or intermittent employees to processes, operations, or tasks for which a workplace security evaluation has not yet been conducted.
7. Whenever workplace security conditions warrant an inspection.

The following policies and procedures are established to ensure employees and worker union representatives participate in designing and conducting periodic inspections to identify and evaluate workplace violence hazards:

1. Bi-annual all-staff meetings where RNT inspectors report-back findings of their hazard assessment and employees can provide feedback regarding concerns and best practices for preventing workplace violence.
2. Access to an anonymous comment box where employees can provide feedback regarding any safety concerns.
3. RNT shall allow access to incident logs and summary of corrective action taken.

### **Inspections**

Periodic inspections of security hazards consist of identifying and evaluating workplace violence hazards and changes in employees' work practices. This may require assessment for more than one type of workplace violence. RNT performs inspections for each type of workplace violence by using the methods specified below.

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***Inspections for Type I (Violence by Strangers) workplace security hazards include assessing:***

- The exterior and interior of the workplace for its attractiveness to thieves.
- The need for security surveillance measures, such as mirrors and cameras.
- Adequate lighting outside of and within facilities.
- Signage notifying the public that Rent Board fees are not accepted in office.
- Procedures for employee response during a robbery or other criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Emergency telephone numbers for law enforcement, fire, and medical services both posted and located on employee desk phone speed dial buttons.
- Whether employees have access to a telephone with an outside line.
- The amount of cash on hand and use of time access safes for large bills.
- Whether employees have effective escape routes from the workplace.
- Whether doors to offices and rooms can be locked.
- Whether employees have a designated safe area where they can go to in an emergency.

***Inspections for Type II (Violence by Customers/Clients) workplace security hazards include assessing:***

- Access to and freedom of movement within the workplace by members of the public.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, and physical barriers.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons visiting the workplace.
- Employees' skill in safely handling threatening or hostile service recipients.
- Effectiveness of systems and procedures that warn others of a security danger or that summon assistance, e.g., RNT Teams General or Support Channels, alarms, or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- Whether doors to offices and rooms can be locked.
- Whether employees have a designated safe area where they can go to in an emergency.

***Inspections for Types III (Violence by Current or Past Coworkers) workplace security hazards include assessing:***

- How well RNT's anti-violence policy has been communicated to employees, supervisors, or managers.
- How well RNT's management and employees communicate with each other.
- RNT's employees', supervisors', and managers' knowledge of the warning signs of potential workplace violence.

- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
- Employee disciplinary and discharge procedures.
- The availability of employee escape routes.
- Whether doors to offices and rooms can be locked.
- Whether employees have a designated safe area where they can go to in an emergency.

***Inspections for Type IV (Violence by someone with Personal Relations with an Employee) workplace security hazards include assessing:***

- Access to and freedom of movement within the workplace.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, and physical barriers.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons visiting the workplace.
- Employees' skill in safely handling threatening or hostile service recipients.
- Effectiveness of systems and procedures that warn others of a security danger or that summon assistance, e.g., RNT Teams General or Support Channels, alarms, or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- Whether doors to offices and rooms can be locked.
- Whether employees have a designated safe area where they can go to in an emergency.

**Corrective Action**

Hazards will be corrected according to the following procedures:

1. When first observed or discovered.
2. If an imminent hazard exists that cannot be immediately abated without endangering employees and/or property, all exposed employees will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.
3. All corrective actions taken and dates they are completed will be documented on the appropriate forms [Violent Incident Report and Violent Incident Analysis and Log.]

The following policies and procedures are established to ensure employee and employee representatives participate in identifying, evaluating, and determining corrective measures to prevent workplace violence:

1. Bi-annual all-staff meetings where RNT Senior Staff report-back any corrective measures taken or needed based on the quarterly inspection and assessment findings and where staff can provide feedback regarding concerns and best practices for preventing workplace violence.
2. Access to an anonymous comment box where employees can provide feedback on the of corrective measures taken.
3. RNT shall allow access to incident logs and summary of corrective action taken.

***Corrective measures for Type I (Violence by Strangers) workplace security hazards may include the following:***

- Improve lighting around and at the workplace.
- Provide additional emergency buttons to employees and install emergency alarms at the workplace.
- Identify rooms that have a lockable door.
- Utilize surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
- Procedures for reporting suspicious persons, activities, and packages.
- Post emergency telephone numbers for law enforcement, fire, and medical services.
- Ensure employees have access to a telephone with an outside line.
- Post signs notifying the public that Rent Board fees are not accepted in office.
- Employee, supervisor, and management training on emergency action procedures.

***Corrective measures for Type II (Violence by Customers/Clients) workplace security hazards may include the following:***

- Control access to the workplace and freedom of movement such that access is consistent with business necessity.
- Ensure the adequacy of workplace security systems, such as door locks, security windows, and physical barriers.
- Provide employee training on recognizing and handling threatening or hostile situations that may lead to violent acts by members of the public who receive services at the Department, including identifying parties doing business with the department who may be parties to domestic violence, civil harassment, or other types of restraining orders.
- Install effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
- Provide procedures for a "buddy" system for specified emergency events.
- Ensure adequate employee escape routes.

***Corrective measures for Type III (Violence by Current or Past Coworkers) workplace security hazards may include the following:***

- Effectively communicate RNT's anti-violence policy to all employees, supervisors, or managers.
- Improve how well RNT's management and employees communicate with each other.

- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
- Control access to, and freedom of, movement within the workplace by non-employees, include recently discharged employees or persons with whom one of the Department's employees is having a dispute.
- Provide counseling to employees, supervisors or managers who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of co-employees.
- 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.
- Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.

***Corrective measures for Type IV (Violence by someone with Personal Relations with an Employee) workplace security hazards may include the following:***

- Effectively communicate RNT's anti-violence policy to all employees, supervisors, or managers.
- Ensure a confidential method for employees to inform their supervisor of restraining orders or threats of violence by someone with personal relations with the employee.
- 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.
- Improve communication between RNT's management and employees.
- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.

## **K. COMPLIANCE**

Management will ensure that all workplace security policies and procedures are clearly communicated and understood by all affected employees. Managers and supervisors will enforce the rules fairly and uniformly.

All affected employees will follow all workplace security directives, policies, and procedures, and assist in maintaining a safe work environment.

RNT's system to ensure that employees comply with the rules and maintain a secure work environment will include at a minimum:

- Inform employees of the provisions of RNT's WVPP.
- Recognize employees who perform secure workplace practices.
- Provide training to employees who fail to comply with secure workplace practices.
- Discipline employees for repeated failure to comply with secure workplace practices.

Department of RNT ensures the following:

- Employees will not be threatened with adverse action or retaliated against in any way if they refuse to report to or leave a workplace because they have a reasonable belief that the workplace is unsafe.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.

## **L. RECORD KEEPING**

RNT has taken the following steps to implement and maintain our WVPP:

1. Records of workplace security hazard assessment inspections, including the person(s) or persons conducting the inspection, the workplace security concerns that have been identified and the action taken to correct the identified concerns, are recorded on a hazard assessment and correction form; and
2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on a worker training and instruction form.

Inspection records and training documentation will be maintained as required by law.

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**

RNT has established and implemented a system to review the effectiveness of the WVPP at least annually in conjunction with employees and their representatives regarding the employees' respective work areas, services, and operations. The review includes:

- Sufficiency of security systems, including alarms, emergency response, and security personnel availability (if applicable).
- Job design, equipment, and facilities to ensure they are optimized to prevent workplace violence incidents.
- Proper identification, evaluation, and correction of security risks.



The WVPP is to be updated whenever deficiencies are found during the review. Employees will be trained on any changes.

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. The whole plan will be reviewed annually or more often if there are violent incidents.

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Executive Director

4/15/24

Date

## **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 employees 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

**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?

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

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**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.

Logs will be forwarded to DHR on a timely basis, ideally within 48 hours after completion. RNT will review the data quarterly and make improvements to prevent further incidents.

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	CAT Notified Y/N	Police Notified Y/N