

WORKPLACE SECURITY PROGRAM

PRINTING INDUSTRIES OF CALIFORNIA

SAMPLE WORKPLACE SECURITY

PROGRAM

INTRODUCTION

This sample is an addendum to the PIC Printer's SB 198 Cal OSHA Handbook, first published in June 1991. It was created as a tool to help graphic arts companies better respond to the requirements of the "Cal/OSHA Guidelines For Workplace Security" published on August 15, 1994. PIC would like to thank the Labor Law Offices of Silver & Freedman, which provided the basic sample policy language, with minor editing by PIC. The sample provides the following:

1.____ A "Workplace Security Policy". Since every company has the potential of a violent act occurring in their work environment, PIC strongly recommends the distribution of this policy to all employees by all companies. Companies with "Employee Handbooks" may wish to add this policy to their employee handbook. It is further recommended that all employees receive orientation or training from the company on this policy, so they may better understand it. The training should be documented by using the standard individual or group training forms on pages 4-5 and 4-7 of the SB 198 handbook, referred to above.

2.____ The "potential acts of violence", which can occur in a workplace, divided into three basic categories or "types". Each company must review these "types" of violent acts, by category, to determine if their work environment has the potential of any or all of these "types" occurring. The violent acts or threats of violence describe in Type III potentially could affect every graphic arts company. **AT MINIMUM, IT IS RECOMMENDED BY PIC THAT ALL COMPANIES ESTABLISH STEPS AS DESCRIBED IN THIS DOCUMENT FOR TYPE III ACTS OF VIOLENCE.**

3.____ The steps to be taken by the company, based on its evaluation of the potential "types" of violence in their work environment determined above in #2, which are described by "type" in this sample.

Effort has been made to create a sample "Workplace Security Prevention Program" which conforms to applicable Cal/OSHA guidelines, as understood, but the company may wish to have its final program reviewed by a labor attorney.

WORKPLACE SECURITY POLICY

The Company is committed to providing a workplace that is free from acts of violence or threats of violence. In keeping with this commitment, the Company has established a policy that provides “zero tolerance” for actual or threatened violence against co-workers, visitors, or any other persons who are either on our premises or have contact with employees in the course of their duties. Security and safety in the workplace is every employee’s responsibility. It is therefore essential that every employee understand the importance of workplace safety and security.

COMPLIANCE IS ESSENTIAL

Compliance with this anti-violence policy is a condition of employment. Due to the importance of this policy, employees who violate any of its terms, who engage in or contribute to violent behavior, or who threaten others with violence may be subject to disciplinary action, up to and including immediate termination.

In order to promote compliance with this policy and maximize our efforts to provide a safe and secure workplace that is free from violence, the Company as a part of its “Written Injury and Illness Program” has established security measures and practices. It will also provide programs to train and retrain employees as appropriate. This will assist employees and the employer to make the workplace more secure, and to remedy any problems and workplace security hazards that are identified before they lead to injuries.

REPORTING UNSAFE CONDITIONS AND SECURITY RISKS

Every verbal or physical threat of violence must be treated seriously and reported immediately to

_____. _____ will be responsible to consult with the appropriate resources and witnesses. Where a violation of the policy is found, _____ will take appropriate corrective action.

In situations where an employee becomes aware of an imminent act of violence, a threat of imminent violence, or actual violence, emergency assistance must be sought immediately. In such situations, the employee should immediately contact _____ and, if appropriate, contact law enforcement authorities by dialing 911.

Employees should immediately inform their supervisor about any workplace security hazards. If an employee’s supervisor is not readily available, the employee should immediately inform _____ so that appropriate action can be taken.

COOPERATION AND QUESTIONS

Full cooperation by all employees is necessary for the employer to accomplish its goal of maximizing the security and safety of its employees. Employees should direct any questions they have regarding their obligations under this policy to _____. Employees can report violations of the policy and raise any questions regarding their obligations under this policy without fear of reprisal of any kind.

INJURY AND ILLNESS PREVENTION PROGRAM FOR WORKPLACE SECURITY

POTENTIAL ACTS OF VIOLENCE BY CATEGORIES

Our Company, as a part of its “Injury and Illness Prevention Program (IPP)” for Workplace Security, has reviewed and analyzed its work environment for potential workplace security issues. The company believes the following “types” of violence, where checked, may potentially affect our workplace and our employees. Based on this determination, the company has established specific actions and steps to be taken by management and employees to help assure a workplace free of 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 Company, such as a vendor or a customer.

_____ Type III involves a violent act or threat of violence by a current or former employee, supervisor or manager, or another person who has some employment-related involvement with our Company, such as an employee’s spouse or lover, an employee’s relative or friend, or another person who has a dispute with one of our employees.

RESPONSIBILITY

The IIP Program administrator for workplace security is _____, who has the authority and responsibility for implementing the provisions of this program for the Company.

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

COMPLIANCE

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

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

All employees 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 employees, including supervisors and managers, comply with work practices that are designed to make the workplace more secure, and do not

“COMPLIANCE” (Continued)

engage in threats or physical actions which create a security hazard for others in the workplace, includes the following items:

1. Informing employees, supervisors and managers of the provisions of our IIP Program for Workplace Security.
2. Evaluating the performance of all employees in complying with our Company’s workplace security measures.
3. Recognizing employees who perform work practices which promote security in the workplace.
4. Providing training and/or counseling to employees whose performance is deficient in complying with work practices designed to ensure workplace security.
5. Disciplining employees for failure to comply with workplace security practices.
6. Distribution of company’s “Workplace Security Policy” to all employees, including training or orientation sessions for employees to better understand the policy.

COMMUNICATION

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

1. New employee orientation on our Company’s workplace security policies, procedures and work practices.
2. Periodic review of our IIP Program for Workplace Security with all personnel.
3. Training programs designed to address specific aspects of workplace security unique to our Company.
4. A system to ensure that all employees, including managers and supervisors, understand the workplace security policies.
5. Posted or distributed workplace security information.
6. A system for employees to inform management about workplace security hazards or threats of violence.
7. Procedures for protecting employees who report threats from retaliation by the person making the threats.

OPTIONAL:

8. ___ Company has fewer than ten employees and communicates with and instructs employees orally about general safe work practices with respect to workplace security.

9. ___ Regularly scheduled safety meetings with all personnel that include workplace security discussions.

10. ___ Addressing security issues at our workplace security team meetings.

11. ___ Other: _____

HAZARD ASSESSMENT

We will be performing assessment of workplace security issues in the form of periodic inspections. Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence are performed by _____.

Periodic Inspections are performed according to the following schedule:

1. [Note Frequency (Daily, Weekly, Monthly, Etc.)] _____;
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 consist of identification and evaluation of workplace security hazards and changes in employee work practices, and may require assessing for more than one type of workplace violence. Our Company performs inspections for each type of workplace violence, identified and specified by the company as a potential workplace security issue, by using the methods specified below.

Inspections for Type I workplace security hazards include assessing the items checked:

1. ___ The exterior and interior of the workplace for its attractiveness to robbers.
2. ___ The need for security surveillance measures, such as mirrors or cameras.
3. ___ Posting of signs notifying the public that limited cash is kept on the premises.
4. ___ Procedures for employee response during a robbery or other criminal act.
5. ___ Procedures for reporting suspicious persons or activities.
6. ___ Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.

HAZARD ASSESSMENT (Continued)

7.____ Limiting of the amount of cash on hand and using time access safes for large bills.

8.____ Other:_____

Inspections for Type II workplace security hazards include assessing:

1.____ Access to, and freedom of movement within, the workplace.

2.____ Adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems.

3.____ Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our Company.

4.____ Employees' skill in safely handling threatening or hostile service recipients.

5.____ Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.

6.____ The use of work practices such as "buddy" systems for specified emergency events.

7.____ The availability of employee escape routes.

8.____ Other:_____

Inspections for Type III workplace security hazards include assessing:

1.____ How well our Company's anti-violence policy has been communicated to employees, supervisors or managers.

2.____ How well our Company's management and employees communicate with each other.

3.____ Our employees', supervisors' and managers' knowledge of the warning signs of potential workplace violence.

4.____ 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.

5.____ Frequency and severity of employee reports of threats of physical or verbal abuse by managers, supervisors or other employees.

HAZARD ASSESSMENT (Continued)

6. ___ Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

7. ___ Employee disciplinary and discharge procedures.

8. ___ Other: _____

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 employees 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: _____

HAZARD CORRECTION

Hazards which threaten the security of employees shall be corrected in a timely manner based on severity when they are first observed or discovered. Our company performs hazard correction for each potential type of workplace violence, identified by the company as a workplace security issue, by using the corrective measures specified below:

Corrective measures for Type I workplace security hazards can include:

1. ___ Making the workplace unattractive to robbers.
2. ___ Utilizing surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace.
3. ___ Procedures for reporting suspicious persons or activities.

HAZARD CORRECTION (Continued)

4. ___ Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.
5. ___ Posting of signs notifying the public that limited cash is kept on the premises.
6. ___ Limiting the amount of cash on hand and using time access safes for large bills.
7. ___ Employee, supervisor and management training on emergency action procedures.
8. ___ Other: _____

Corrective measures for Type II workplace security hazards include:

1. ___ Controlling access to the workplace and freedom of movement within it, consistent with business necessity.
2. ___ Ensuring the adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems.
3. ___ Providing employee training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our Company.
4. ___ Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
5. ___ Providing procedures for a “buddy” system for specified emergency events.
6. ___ Ensuring adequate employee escape routes.
7. ___ Other: _____

Corrective measures for Type III workplace security hazards include:

1. ___ Effectively communicating our Company’s anti-violence policy to all employees, supervisors or managers.
2. ___ Improving how well our Company’s management and employees communicate with each other.
3. ___ Increasing awareness by employees, supervisors and managers of the warning signs of potential workplace violence.
4. ___ Controlling access to, and freedom of movement within, the workplace by non-employees, including recently discharged employees or persons with whom one of our employee’s is having a dispute.

HAZARD CORRECTION (Continued)

5. ___ Providing 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.

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 employee disciplinary and discharge procedures address the potential for workplace violence.

8. ___ Other: _____

TRAINING AND INSTRUCTION

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

All employees, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided under the following circumstances to include:

1. When the IIP Program for Workplace Security is first established and periodically thereafter.
2. To all new employees and to other employees for whom training has not previously been provided .
3. To all employees, supervisors and managers given new job assignments for which specific workplace security training for that job assignment has not previously been provided.
4. 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, identified by company as a potential workplace security issue, associated with the three types of workplace violence.

TRAINING AND INSTRUCTION (Continued)

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. Employee 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 employee.
9. Post-event trauma counseling for those employees desiring such assistance.

In addition, we provide specific instructions to all employees regarding workplace security hazards unique to their job assignment, identified by the company as a potential workplace security issue, to the extent that such information was not already covered in other training.

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

1. Crime awareness.
2. Location and operation of alarm systems.
3. Communication procedures.
4. Other: _____

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

1. Self-protection
2. Dealing with angry, hostile and threatening individuals.
3. Location, operation, care and maintenance of alarm systems and other protective devices.
4. Communication procedures.
5. Determination of when to use the “buddy” system or other assistance from co-employees.
6. Awareness of indicators that lead to violent acts by service recipients.

TRAINING AND INSTRUCTION (Continued)

7. ___ Other: _____

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

1. ___ Pre-employment screening practices.
2. ___ Employee Assistance Programs.
3. ___ Awareness of situation indicators that lead to violent acts.
4. ___ Managing with respect and consideration for employee well-being.
5. ___ Review of anti-violence policy and procedures.
6. ___ Other: _____

RECORDKEEPING

The following records are maintained for three years under the company's Workplace Security Prevention Program.

1. ___ Records of workplace security inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, which have been recorded on a hazard assessment and correction form.
2. ___ Documentation of security training for each employee, including the employee's name or other identifier, training dates, type(s) of training, and training providers.
3. ___ Inspection records and training documentation.