

City of Palm Springs Workplace Violence Prevention Plan (“WVPP”)

Updated June 24, 2024

TABLE OF CONTENTS

I. PURPOSE 3

II. SCOPE OF COVERAGE 3

 a. Workplaces3

 b. Employees4

III. EFFECTIVE DATE..... 4

IV. DEFINITIONS 4

V. THE PLAN..... 6

 a. Access.....6

 b. Implementation7

 c. Obtaining Active Employee Involvement in Developing and Implementing the Plan8

 d. Coordination with Other Employers10

 e. Compliance10

 f. Communicating to Employees about Workplace Violence11

 g. Identification, Evaluation, and Correction of Workplace Violence Hazards17

 h. Responding to Workplace Violence Emergencies.....20

 i. Training21

VI. RECORDKEEPING21

VII. ATTACHMENT #1.....21

I. Purpose

The purpose of the City of Palm Springs' Workplace Violence Prevention Plan ("Plan" or "WVPP") is to establish, implement, and maintain an effective workplace violence prevention plan as required under Labor Code sections 6401.7 and 6401.9.

Specifically, this Plan contains procedures to address the following statutory requirements:

- 1) Record information in a Violent Incident Log for every incident of Workplace Violence, as defined below.
- 2) Provide effective training to employees on the legal requirements related to the prevention of workplace violence, including but not limited to the City of Palm Springs' WVPP.
- 3) Maintain records of the following: (a) Workplace Violence hazards, (b) City of Palm Springs' employee (hereinafter referred to as "employees") trainings, (c) Violent Incident Logs, and (d) the investigation of any incident of Workplace Violence.
- 4) Ensure certain records are made available to the Division of Occupational Safety and Health ("Division" or "DOSH"), employees, and any authorized employee representatives.

II. Scope of Coverage

a. Workplaces

The WVPP shall apply to all City of Palm Springs workplaces, unless a workplace is expressly exempted from coverage.

The following workplaces are exempt from and not subject to the WVPP:

- 1) A workplace that an employee has chosen to telework from that is not under the control of the City of Palm Springs.

b. Employees

The WVPP applies to all City of Palm Springs' employees, unless an employee is expressly exempted.

The following employees are exempt from coverage under the WVPP:

- 1) An employee who is teleworking from a location of the employee's choice, which is not under the control of the City of Palm Springs.

III. Effective Date

The effective date of this Plan is July 1, 2024.

The Plan shall continue in full force and effect until repealed or rescinded.

IV. Definitions

For the purposes of the WVPP, the following definitions apply:

- “Access” means the right and opportunity to examine and receive a copy of the WVPP.
- “Designated Representative” means any individual or organization to whom an employee gives Written Authorization to exercise a right of Access. A recognized or certified collective bargaining agent shall be considered a Designated Representative for the purpose of Access to the WVPP.
- “Emergency” or “Emergencies” means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
- “Engineering Controls” mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.
- “Serious Injury or Illness” means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.
- “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.
- “Workplace Violence” means any act of violence or Threat of Violence that occurs in the City of Palm Springs’ covered workplace. Workplace Violence does not include lawful acts of self-defense or defense of others.
- Workplace Violence includes but is not limited to the following:
 - 1) The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury. This includes other behavior, which can

include belligerent speech, excessive arguing or swearing, sabotage, threats of sabotage or suggestion of sabotage of City property, harassing or threatening telephone calls, letters, or other forms of written or electronic communications, or a demonstrated pattern of refusal to follow City policies and procedures.

- 2) Intimidating or attempting to coerce an employee to do wrongful acts that would adversely affect the business interests of the City.
- 3) Harassing surveillance or “stalking” such as the willful, malicious and repeated following of another person and making a credible threat with intent to place the other person in reasonable fear of their safety.
- 4) An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, paraphernalia, dangerous devices and materials of any kind on City premises, in City parking lots, to City related events or while conducting City business regardless of whether the employee sustains an injury.
- 5) The following four (4) types of Workplace Violence:
 - “Type 1 violence” means Workplace Violence committed by a person who has no legitimate business at the workplace and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
 - “Type 2 violence” means Workplace Violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 - “Type 3 violence” means Workplace Violence against an employee by a present or former employee, supervisor, or manager.
 - “Type 4 violence” means Workplace Violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.
- **“Workplace Violence Prevention Committee”** (“Committee”) means the group of employees who assess the City of Palm Springs’ Workplace Violence hazards and support in the implementation of the WVPP.
- **“Workplace Violence Prevention Coordinator”** (“Coordinator/Human Resources Director”)/**“Occupational Health & Safety Manager”** (“Safety Manager”) means the individual who is responsible for implementing the WVPP.
- **“Work Practice Controls”** means procedures and rules, which are used to effectively reduce Workplace Violence hazards.

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- “Written Authorization” means a request provided to the City of Palm Springs containing the following information:
 - 1) The name and signature of the employee authorizing a representative of the employee to access the WVPP on the employee’s behalf;
 - 2) The date of the request;
 - 3) The name of the designated representative (individual or organization) authorized to receive the WVPP on the employee’s behalf; and
 - 4) The date upon which the Written Authorization will expire, if less than one (1) year.
 - “WVPP” or “Plan” means the Workplace Violence Prevention Plan.
 - “Violent Incident Log” or “Log” means the violent incident log required by this WVPP.

V. The Plan

a. Access

The City of Palm Springs makes the WVPP available and accessible to employees, Designated Representatives, and representatives of the DOSH at all times.

1) Employees

The City of Palm Springs will provide Access to the WVPP to employees as follows:

- 1) The City of Palm Springs has made and will continue to make the WVPP available and will provide Access to employees by providing an employee a physical copy of the WVPP within five (5) business days of receiving the request for Access from the employee.

Whenever an employee requests a copy of the WVPP, the City of Palm Springs shall provide the requesting employee a printed copy of the WVPP, unless the employee agrees to receive an electronic copy of the WVPP.

- 2) An employee can Access the WVPP through the City of Palm Springs’ website, [<https://www.palmspringsca.gov/government/departments/human-resources/policies-and-mou-s>], where the employee can review, print, and email the current version of the WVPP.

2) Designated Representatives

The City of Palm Springs will make the WVPP available and provide access to Designated Representatives in a manner consistent with Section V(a)(1) of the City of Palm Springs’ WVPP only after the employee provides Written Authorization to the City of Palm Springs, unless

otherwise stated.

The City of Palm Springs makes the WVPP available and provides access to any employee organization that represents employees in a manner consistent with WVPP Section V(a)(1) without requiring that an employee provide prior Written Authorization to the City of Palm Springs.

3) DOSH Representatives

The City of Palm Springs will make the WVPP available to DOSH representatives upon request.

b. Implementation

1) Human Resources Director

The individual(s) identified below shall serve as the City of Palm Springs’ “Workplace Violence Prevention Coordinator” and is authorized to and responsible for implementing the WVPP:

Job Title/Position	Contact Information	WVPP Responsibilities
Human Resources Director	(760) 323-8215 or hr@palmspringsca.gov	Implementation of WVPP
Occupational Health & Safety Manager	(760) 323-8215 or hr@palmspringsca.gov	Implementation of WVPP

Specifically, the Safety Manager will be responsible for the following:

- 1) Serve as the Chair of the City of Palm Springs’ Workplace Violence Prevention Committee (“Committee”);
- 2) Establish and coordinate Work Practice Controls;
- 3) Establish and coordinate Engineering Controls;
- 4) Respond to reports of Workplace Violence incidents and Workplace Violence hazards, including investigating incidents of Workplace Violence and Workplace Violence hazards.

2) Workplace Violence Prevention Committee (“Committee”)

The City of Palm Springs established a Workplace Violence Prevention Committee (“Committee”) to assess the City of Palm Springs’ Workplace Violence hazards and determine preventative actions to be taken.

The Committee shall be comprised of the Occupational Health & Safety Manager and the following individuals: HR Specialist-Safety, Fire Marshall, Emergency Management Coordinator, Aviation Supervisor, Maintenance & Facilities Supervisor, Information Technology designee, Police Department Supervisor, Parks & Recreation Supervisor, and Library Supervisor.

The Committee shall undertake the following:

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- 1) Meet regularly, but not less than quarterly;
 - 2) Prepare and make available to any affected employees, the records of the workplace violence issues discussed at the Committee meetings and maintained for review by DOSH upon request;
 - 3) Review the results of the City of Palm Springs' periodic, scheduled workplace inspections;
 - 4) Review investigations of Workplace Violence and their causes, and where appropriate, submit suggestions to the City of Palm Springs' management for the prevention of future incidents;
 - 5) Review investigations of alleged Workplace Violence hazards brought to the attention of any Committee member. When determined necessary by the Committee, the Committee may conduct its own inspection and investigation to assist in remedial solution(s);
 - 6) Submit recommendations to assist in the evaluation of employee safety suggestions;
 - 7) Upon request from the DOSH, verify abatement action taken by the City of Palm Springs to abate citations issued by the DOSH;
 - 8) Provide updates to the WVPP;
 - 9) Prepare and implement Workplace Violence training subsequent to the initial training; and
 - 10) At minimum, review the WVPP under the following circumstances: (a) once annually; (b) when a deficiency is observed or becomes apparent; and (c) after a Workplace Violence incident.
 - a) A review of the WVPP should include the following: (a) review of the Violent Incident Log; (b) review employee comments and feedback on the WVPP; (c) review of other records; and (d) a physical inspection of the workplace.
 - b) Following the review, report any revisions to the Plan to employees.

c. *Obtaining Active Employee Involvement in Developing and Implementing the Plan*

The City of Palm Springs encourages the active involvement of employees in developing and implementing the WVPP through and by the measures discussed in the sections below.

1) Identifying, Evaluating, and Correcting Workplace Violence Hazards

The City of Palm Springs encourages the active involvement of employees in identifying, evaluating, and correcting Workplace Violence hazards through and by the following means:

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- 1) Regular meetings of the Committee comprised of both the City of Palm Springs and employees that are charged with identifying, evaluating, and correcting Workplace Violence hazards;
 - 2) Survey employees regarding the identification, evaluation, and correction of any Workplace Violence hazards;
 - 3) A suggestion box will be installed in the HR lobby to provide a means by which employees may provide anonymous feedback regarding the identification, evaluation, and correction of any Workplace Violence hazards; and
 - 4) Provide a means by which employees may report potential Workplace Violence hazards that the City of Palm Springs will evaluate and, if necessary, correct.

2) Designing and Implementing Training

The City of Palm Springs encourages the active involvement of employees in designing and implementing training through and by the following means:

- 1) Provide opportunities for employees to identify the daily activities they believe put them at most risk for Workplace Violence and address those activities within the training;
- 2) Authorize sufficient time and resources to facilitate employee participation, including holding trainings during regular working hours; and
- 3) Creating a survey to evaluate the effectiveness of the training and authorize sufficient time and resources following each training to ensure employees can complete the evaluation. The City of Palm Springs shall adapt the training based on the results of these evaluations.

3) Reporting and Investigating Workplace Violence Incidents

The City of Palm Springs encourages the active involvement of employees in reporting and investigating Workplace Violence incidents through and by the following means:

- 1) Regular meetings of the Committee comprised of both the City of Palm Springs and employee Representatives that are charged with reviewing investigations of Workplace Violence incidents and hazards;
- 2) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern in which there is an immediate threat to the employee's safety or the safety of others or where a Serious Injury or Illness has occurred to immediately report the incident to law enforcement, security, and/or emergency medical services;

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- 3) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern to immediately report the facts and circumstances of the violent incident, threat, or other Workplace Violence concern to their supervisor, or to the Department of Human Resources;
 - 4) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern to participate in the investigation of the violent incident, threat, or other Workplace Violence concern;
 - 5) Implement procedures to ensure that employees are not retaliated against for reporting or participating in investigations of Workplace Violence incidents;
 - 6) Allocate adequate resources and training for employees to appropriately recognize Workplace Violence concerns;
 - 7) Provide coverage, if necessary, so employees can immediately report a concern of Workplace Violence during their regularly scheduled work hours and participate in investigations.

d. Coordination with Other Employers

If and when applicable (*e.g.*, for multi-employer workplaces), the City of Palm Springs shall coordinate the implementation of the Plan with other employers in order to ensure that those employers and employees understand their respective roles, as provided in the Plan.

At a multiemployer worksite, the City of Palm Springs will ensure that when an employee experiences a Workplace Violence incident, the City of Palm Springs shall record the information in the Violent Incident Log and provide a copy of that Log to the controlling employer. If the City of Palm Springs is the controlling employer at a worksite, the City of Palm Springs will ensure that it receives copies of all Logs from other employers.

e. Compliance

The City of Palm Springs will ensure compliance with the Plan through and by the measures discussed in this section.

1) Expectations of Employees Regarding Compliance with the Plan
A. Employees

All employees should be familiar with the WVPP and its requirements.

All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting the City of Palm Springs maintain a safe and secure work environment.

All employees are required to know, understand, and adhere to the safety rules that apply to their workplace and the work they perform.

B. Managers and Supervisors

Managers and supervisors are responsible for implementing and maintaining the WVPP in their respective work areas and for ensuring that all employees adhere to the safety rules that apply in these work areas.

Managers and supervisors should answer questions that employees may have about the Plan and its requirements, be able to direct employees to the Department of Human Resources or provide resources for employees to use that will answer their questions.

2) Methods to Ensure Compliance

A. Recognition of Employees Who Comply with the Plan

The City of Palm Springs recognizes employees who comply with the Plan through the following positive reinforcement procedure by notating such within the employee's performance evaluation.

B. Training and Retraining of Employees on Plan Requirements

The City of Palm Springs shall ensure substantial compliance with the WVPP by providing employees with training as discussed in the Plan.

C. Enforcement of the Plan Requirements and Discipline for Non-Compliance

Managers and supervisors will enforce the rules and requirements related to the Plan fairly and uniformly.

Employees who do not comply with the safety rules and requirements set forth in the Plan may be subject to discipline, up to and including termination.

Managers and supervisors who do not enforce the rules and requirements related to the Plan or do not enforce them fairly and uniformly may be subject to discipline, up to and including termination.

f. Communicating to Employees about Workplace Violence

The City of Palm Springs' will communicate to employees about reporting and investigating Workplace Violence incidents.

The City of Palm Springs' procedures for communicating to employees regarding Workplace Violence incidents include the following:

- 1) Reporting on violent incidents, threats, or other violent Workplace Violence concerns;
- 2) Informing affected employees of the general results of any investigation into Workplace Violence incidents, while protecting the privacy of affected and/or involved employees;

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- 3) Informing affected employees of the corrective actions taken in response to the Workplace Violence incident, while protecting the privacy of affected and/or involved employees; and
 - 4) Communicating to employees about the prohibition on retaliating against employees who participate in the investigation of Workplace Violence incidents.

1) Reporting Violent Incidents

Supervisors will notify the Human Resources Department of workplace violence incidents.

An employee may report a Workplace Violence incident through any of the following means:

- 1) Reporting the incident to any manager or supervisor verbally or in writing;
- 2) Reporting the incident to the Department of Human Resources;
- 3) Reporting the incident to a Designated Representative, who will facilitate a report to the City of Palm Springs. The City of Palm Springs will respond to the report after it receives the report from the Designated Representative;
- 4) Reporting by completing and submitting a physical or electronic letter to the Department of Human Resources via interoffice mail or by email at HR@palmspringsca.gov.

2) Acceptance of and Response to Reports of Workplace Violence

The City of Palm Springs shall accept and respond to all reports of Workplace Violence.

A. Immediate Response

Immediately following a report of Workplace Violence, the City of Palm Springs shall immediately respond by providing first aid and emergency care to the injured employee(s) and by taking any measures necessary to prevent other employees from being injured.

The City of Palm Springs will ensure that any injured employees receive prompt medical evaluation and treatment and that injured employees are provided transportation to receive medical care, if such care is not provided on site.

The City of Palm Springs will immediately report to DOSH any Serious Injury or Illness or death of an employee that is attributable to Workplace Violence.

B. Investigating the Report of Workplace Violence

The City of Palm Springs shall investigate reports of Workplace Violence as provided in the following section.

C. No Retaliation

The City of Palm Springs shall not take adverse action against any employee who reports Workplace Violence or who participates in any investigation of Workplace Violence based on such conduct.

D. Provision of Leave for Employees Who are or May be Victims of Violence

The City of Palm Springs shall not take adverse action against any employee who takes time off from work in order to seek a Temporary Restraining Order (“TRO”) or to obtain other assistance to help safeguard the “health, safety, or welfare” of the employee or their child based on such conduct. An employee may use paid sick leave pursuant to the City of Palm Springs Personnel Rules or applicable MOU to take time off from work for these purposes.

An employee shall provide the City of Palm Springs reasonable and advance notice of their intention to take time off from work for either of these purposes if feasible. If advance notice is not feasible, employees must provide a certification to the employer within a reasonable time after the absence.

E. Temporary Restraining Orders

When an employee has suffered unlawful violence or a credible Threat of Violence from any individual, which may reasonably be carried out at any of the City of Palm Springs’ workplaces, the City of Palm Springs may attempt to obtain a TRO on behalf of the employee.

3) Investigation of Workplace Violence

The City of Palm Springs shall respond to reports of Workplace Violence or a Threat of Violence by promptly initiating an investigation, as applicable.

The City of Palm Springs’ investigation of Workplace Violence or a Threat of Violence may include, but not necessarily be limited to, the following steps or measures, as applicable:

- 1) Visiting the scene of an incident as soon as safe and practicable;
- 2) Collection of facts on who, what, when, where, and how the incident occurred;
- 3) Collection of statements from involved parties, such as employees, witnesses, law enforcement, and/or security personnel;
- 4) Reviewing security footage of existing security cameras if applicable;
- 5) Collection of photographic or video evidence of damage or injuries, where appropriate;
- 6) Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator;

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- 7) Consultation with the affected employees, and witnesses to identify potential contributing causes;
 - 8) Obtaining any reports completed by law enforcement;
 - 9) Assessment of any Threat of Violence, identifying the following, as applicable and to the extent the information is known by the City of Palm Springs:
 - a) The exact nature and context of the threat and/or threatening behavior;
 - b) The identified target;
 - c) The person's apparent motivation;
 - d) The person's ability to carry out the threat; and
 - e) The person's background, including work history, criminal record, mental health history, and past behavior on the job.

Following an investigation, the City of Palm Springs may take the following measures, as applicable:

- 1) Notify the affected employees of the general results of the investigation, while protecting the privacy of affected and/or involved employees;
- 2) Implement changes in Engineering Controls, procedures, or policies, if appropriate; and/or
- 3) Establish updated Work Practice Controls, if necessary.

The City of Palm Springs shall retain records of Workplace Violence incident investigations for a minimum of five (5) years.

4) Documentation in Violent Incident Log

All Workplace Violence incidents shall be subsequently reported in the Violent Incident Log. Information that is recorded in the Log for each incident shall be based on information solicited from the employees who experienced the Workplace Violence, on witness statements, and on investigation findings. The City of Palm Springs shall omit from the Log any element of personal identifying information that would be sufficient to allow identification of any person involved in a Workplace Violence incident.

The information recorded in the Log shall include all of the following:

- a. The date, time, and location of the incident;
- b. The Workplace Violence type or types (*e.g.*, Type 1, Type 2, Type 3, or Type 4);

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- c. A detailed description of the incident;
 - d. A classification of who committed the Workplace Violence, including whether the perpetrator was:
 - a) A client or customer;
 - b) Family or friend of a client or customer;
 - c) Stranger with criminal intent;
 - d) Coworker;
 - e) Supervisor or manager;
 - f) Partner or spouse;
 - g) Parent or relative; or
 - h) Other perpetrator;
 - e. A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was:
 - a) Completing usual job duties;
 - b) Working in poorly lit areas;
 - c) Rushed;
 - d) Working during a low staffing level;
 - e) Isolated or alone;
 - f) Unable to get help or assistance;
 - g) Working in a community setting; or
 - h) Working in an unfamiliar or new location.
 - 6) A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area;
 - 7) The type of incident, including, but not limited to, whether it involved any of the following:

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- a) Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting;
 - b) Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object;
 - c) Threat of physical force or threat of the use of a weapon or other object;
 - d) Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact;
 - e) Animal attack; or
 - f) Other;
- 8) Consequences of the incident, including, but not limited to:
 - a) Whether security or law enforcement was contacted and their response;
 - b) Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident;
 - 9) Information about the person completing the Log, including their name, job title, and the date completed.

4) Prohibition on Retaliation

The City of Palm Springs has implemented the following measures to prevent and prohibit retaliation against those who report Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or who participate in the investigation of such incidents or hazards:

- 1) The City of Palm Springs responds to reports of Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence in a prompt and timely manner;
- 2) The City of Palm Springs provides employees multiple channels by which to report incidents, hazards, or concerns, including anonymously and through or by a Designated Representative;
- 3) The City of Palm Springs admonishes managers and supervisors not to retaliate against any employee who reports Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or any employee who participates in the investigation of such incidents or hazards; and
- 4) The City of Palm Springs trains all employees that retaliation against any employee who reports Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or any employee who participates in the investigation of such incidents or

hazards is expressly prohibited and that there are consequences, such as discipline, for retaliation against such employees.

g. Identification, Evaluation, and Correction of Workplace Violence Hazards

The City of Palm Springs shall undertake all necessary actions to identify, evaluate, and correct Workplace Violence hazards.

1) Identification of Workplace Violence Hazards

The City of Palm Springs shall undertake all necessary actions to identify Workplace Violence hazards.

The City of Palm Springs shall conduct inspections of its workplace(s) to identify Workplace Violence hazards.

Specifically, the City of Palm Springs shall conduct inspections under the following circumstances:

- 1) When the WVPP is first established;
- 2) After each Workplace Violence incident;
- 3) Whenever the City of Palm Springs is made aware of a new or previously unrecognized hazard; and
- 4) Every year.

Periodic inspections to identify and evaluate Workplace Violence and hazards will be performed by the following employees in the following areas of the workplace:

HR Specialist (Safety Division)	All City workplaces
Occupational Health & Safety Manager	All City workplaces (e.g., airport, City Hall, City yard, Desert Highland, Fleet, fire stations, Leisure Center, Library, police, fire training center, Demuth Park, & Swim Center).

Inspections for Workplace Violence hazards may include assessing factors specific to the City of Palm Springs' workplace, such as the following:

- 1) The exterior and interior of the workplace for its attractiveness to robbers;
- 2) The need for violence surveillance measures, such as mirrors and cameras;

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- 3) Procedures for employee response during a robbery or other criminal act, including the City of Palm Springs' policy prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act;
 - 4) Procedures for reporting suspicious persons or activities;
 - 5) Effective location and functioning of emergency buttons and alarms;
 - 6) Posting of emergency telephone numbers for law enforcement, fire, and medical services;
 - 7) Whether employees have access to a telephone with an outside line;
 - 8) Whether employees have effective escape routes from the workplace;
 - 9) Whether employees have a designated safe area where they can go to in an emergency;
 - 10) Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems;
 - 11) Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of the City of Palm Springs' our establishment;
 - 12) Employees' skill in safely handling threatening or hostile service recipients;
 - 13) Effectiveness of systems and procedures that warn others of actual or potential Workplace Violence danger or that summon assistance, e.g., alarms or panic buttons;
 - 14) The use of work practices such as the "buddy" system for specified emergency events;
 - 15) The availability of employee escape routes;
 - 16) How well the City of Palm Springs' establishment's management and employees communicate with each other;
 - 17) 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;
 - 18) Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees;
 - 19) Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace; and
 - 20) [Other procedures to identify and evaluate workplace violence hazards]

2) Investigation of Workplace Violence Hazards

The City of Palm Springs will initiate an investigation following the identification of a Workplace

Violence hazard in order to evaluate the nature of the hazard.

The City of Palm Springs may undertake the following as part of such investigation, as applicable:

- 1) Collection of statements from witnesses;
- 2) Collection of photographic or video evidence of damage or injuries, where appropriate; and
- 3) Consultation with the affected employees, and witnesses to identify potential contributing causes.

3) Correction of Workplace Violence Hazards

After the identification and investigation of a Workplace Violence hazard and after a Workplace Violence Hazard inspection, the City of Palm Springs will take appropriate steps to correct the hazard and prevent or control future or potential hazards by implementing the following measures:

- 1) **Substitution:** When possible, the City of Palm Springs will correct a hazard by eliminating or substituting it with a safer Work Practice Control (“Substitution”).
- 2) **Removal of Employees:** In the event that a Workplace Violence hazard exists that cannot be immediately corrected without endangering employees or property, the City of Palm Springs will remove all employees from the work site except those necessary to correct the existing hazard. Employees who are necessary to correct the hazard will be provided with necessary protection in order to protect them from the hazard.
- 3) **Replacement of Equipment:** If a piece of equipment is hazardous, the City of Palm Springs will remove it from service and identify it as defective.
- 4) **Engineering Controls:** The City of Palm Springs will apply physical changes to either remove the hazard from the workplace or create a barrier between employees and the hazard. Based on the nature of the hazard and the needs of the workplace, Engineering Control strategies may include the following: (a) using physical barriers (such as enclosures or guards) or door locks to reduce employee exposure to the hazard; (b) metal detectors; (c) panic buttons; (d) improved or additional lighting; and (e) more accessible exits (where appropriate).
- 5) **Work Practice Controls:** The City of Palm Springs will adjust Work Practice Controls if Substitution or Engineering Controls are impossible or inappropriate. Additional Work Practice Controls may be necessary in addition to Substitution and Engineering Controls to prevent future Workplace Violence hazards. Work Practice Control strategies may include the following: (a) hiring security guards and having them patrol the workplace interior and perimeter; (b) ensuring employees have access to a telephone with an outside line; posting emergency telephone numbers in the workplace for law enforcement, fire, and medical services; (c) improved or altered communication measures; (d) improved or altered policies of prohibited practices (such as a weapons ban or limitation of the amount of cash

on hand); and a “buddy system” for specified Emergency events; (d) adding security cameras or mirrors.

- 6) **Training:** The City of Palm Springs will educate employees about the identified hazard in subsequent WVPP training.
- 7) **Notice to Affected Employees:** The City of Palm Springs will notify affected employees in writing of the corrective measures the City of Palm Springs implemented to address the Workplace Violence hazard.

4) **Recording Information regarding Workplace Violence Incidents**

The City of Palm Springs will document the identification, investigation, and correction of Workplace Violence hazards and maintain such records for at least five (5) years following the identification, investigation, and correction of such hazards.

The City of Palm Springs shall record information in the Violent Incident Log for each Workplace Violence incident.

Information that is recorded in the Log for each incident shall be based on information solicited from the employee(s) who experienced the Workplace Violence, on witness statements, and on investigation findings.

The Log is attached to the WVPP as Attachment #1.

The City of Palm Springs will document all work-related injuries or illness caused by Workplace Violence that resulted in death, loss of consciousness, days away from work, restricted work activity or job transfer, or medical treatment beyond first aid to DOSH.

h. Responding to Workplace Violence Emergencies

The City of Palm Springs will use an emergency alerting system to alert employees of the presence, location, and nature of Workplace Violence Emergencies.

Following a Workplace Violence Emergency, a notification through the alerting system will include information regarding the following:

- 1) The existence/presence of a Workplace Violence Emergency;
- 2) The location of a Workplace Violence Emergency;
- 3) The nature of the Workplace Violence Emergency; and
- 4) The appropriate response procedures for employees.

The City of Palm Springs has developed the following evacuation and/or sheltering plan for each City of Palm Springs workplace:

1) Evacuation Protocols: [Attachment #2]

2) Sheltering Protocols: [Attachment #3]

In a Workplace Violence Emergency, employees can obtain help from any manager or supervisor, the Human Resources Department, or, if applicable, from security or law enforcement. Employees should promptly call 911 in the event of a Workplace Violence Emergency.

i. Training

The City of Palm Springs shall provide training when the Plan is first established and when new employees are hired.

The City of Palm Springs shall ensure annual training thereafter.

The City of Palm Springs shall provide training on all of the following subjects:

- 1) The City of Palm Springs' Plan, how to obtain a copy of the City of Palm Springs' Plan at no cost, and how to participate in the development and implementation of the City of Palm Springs' Plan;
- 2) Definitions and requirements of the Plan;
- 3) How to report Workplace Violence incidents or concerns to the City of Palm Springs or law enforcement without fear of reprisal;
- 4) Workplace Violence hazards specific to the employees' jobs, the corrective measures the City of Palm Springs has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm; and
- 5) The City of Palm Springs' Violent Incident Log, and how to obtain copies of records related to Workplace Violence.

The training shall include an opportunity for interactive questions and answers with a person knowledgeable about the City of Palm Springs' Plan.

The City of Palm Springs shall provide additional training when a new or previously unrecognized Workplace Violence hazard has been identified and when changes are made to the Plan.

VI. Recordkeeping

The City of Palm Springs shall maintain the following types of records for the following periods:

Type of Record	Maintenance Period
Records of Workplace Violence hazard	Minimum of five (5) years

identification, evaluation, and correction	
Training records, including training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions	Minimum of one (1) year
Violent Incident Logs	Minimum of five (5) years
Records of Workplace Violence incident investigations. These records must not contain medical information.	Minimum of five (5) years

The City of Palm Springs shall ensure that records of Workplace Violence Incident Investigations do not contain any medical information including any information in electronic or physical form, in possession of or derived from a provider of health care, health care service plan, pharmaceutical company, or contractor regarding a patient’s medical history, mental health application information, reproductive or sexual health application information, mental or physical condition, or treatment that includes or contains any element of personal identifying information sufficient to allow identification of the individual.

The City of Palm Springs shall make all records required by this WVPP available to DOSH upon request for purposes of examination and copying.

The City of Palm Springs shall make the following records available to employees and their Designated Representatives, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request:

- 1) Records of Workplace Violence hazard identification, evaluation, and correction;
- 2) Training records; and
- 3) Violent Incident Logs.

ATTACHMENT #1

