



# Workplace Violence Prevention Plan (WVPP)

Version 1  
July 1, 2024







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Revision History

Version	Notes
Rev. 0	This written Workplace Prevention Plan (WVPP) results from California Senate Bill 553 becoming law effective January 1, 2024. All employees fall within the scope of California Labor Code (LC) section 6401.7 and LC section 6401.9 and an effective WVPP on July 1, 2024.

## A Message from the General Manager



I am proud to present the Santa Clara Valley Transportation Authority (VTA), Workplace Violence Prevention Plan (WVPP), which represents our unwavering commitment to ensuring the safety and well-being of everyone within our organization. In the transportation industry, where our employees face unique and often unpredictable challenges, it is imperative that we take proactive measures to protect our team from all forms of workplace violence.

Workplace violence is a serious issue that we know can have devastating consequences, not only for the individuals directly involved but also for the overall morale and productivity of our workforce. Recognizing this, we have developed a comprehensive plan that outlines clear policies, procedures, and resources designed to prevent, address, and mitigate incidents of violence in the workplace.

This plan has been carefully crafted in accordance with California's stringent regulations, SB553, and best practices. It includes input from experts in workplace safety, law enforcement, legal, and behavioral health, as well as valuable feedback from our employees and bargaining units. Our goal is to foster a culture of respect, trust, and open communication, where every team member feels safe and supported.

Key components of our WVPP include:

1. **Risk Assessment and Identification:** Regular evaluation of potential hazards and vulnerabilities within our work environment.
2. **Training and Education:** Ongoing training programs for all employees to recognize, report, and respond to signs of workplace violence.
3. **Incident Reporting and Response:** Clear procedures for reporting incidents and a robust response protocol to ensure timely and effective action.
4. **Continuous Improvement:** Regular review and updates of the plan to incorporate the latest safety standards and feedback from our team.

Safety is a priority at VTA and a core value that guides every decision we make. By implementing this WVPP, we are taking a decisive step toward creating a safer, more secure environment for everyone in our organization. I encourage all employees to familiarize themselves with the contents of this plan and to actively participate in its implementation. Together, we can maintain a healthy workplace where safety and respect are paramount.



Thank you.

A handwritten signature in blue ink that reads 'Carolyn M. Gonot'.

Carolyn M. Gonot  
General Manager/CEO  
Santa Clara Valley Transportation Authority

## 1.0 Workplace Violence Prevention Plan Scope

The Workplace Violence Prevention Plan (WVPP) is developed to fulfill Title 49 Code of Federal Regulations (CFR) Part 673 and California Labor Code (LC) sections 6401.7 & 6401.9, which mandates the establishment of a WVPP. The following document is developed under the authority of Policy AS-HR-PL-2600 "Violence Free Workplace" Appendix A establishes the Santa Clara Valley Transportation Authority (VTA) WVPP, addressing security events and security risks associated with the four (4) types of workplace violence as defined by the State of California LC section 6401.9. To encompass all employees, contractors, and third parties VTA utilizes to perform work, VTA has adopted the term "Transit Worker" for this Plan in alignment with the Federal Transit Administration (FTA) and the use of the Term. The term "Transit Worker" is defined as:

"means any employee, contractor, or volunteer working on behalf of the transit agency"

VTA has reviewed the State of California's LC 6401.7 & 6401.9 and California Health and Safety Code 1250 regarding the definition of workplace violence. The use of the word "employee" has been substituted for "Transit Worker" in accordance with this WVPP. Workplace violence is defined as follows:

"Any act of violence or threat of violence that occurs in a place of employment. Workplace violence includes, but is not limited to, the following:

- The threat or use of physical force against an transit worker that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

Workplace violence is further defined into four (4) types:

- Type 1 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 transit workers with the intent to commit a crime.
- Type 2 violence – Workplace violence directed at transit workers by customers, clients, patients, students, inmates, or visitors.
- Type 3 violence – Workplace violence against a transit worker by a present or former transit worker.
- Type 4 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 a transit worker.

To provide further clarification to this plan, VTA has defined a "workplace" as:

"All transit facilities, transit vehicles, transit properties, anywhere where a transit worker is required to perform work, and vicinity where a transit vehicle picks up and carries passengers. This does not include any location where employees are teleworking at the employee's choice which is not under the control of the VTA.

When addressing workplace violence, this plan will classify those occurrences as Security Events. VTA defines Security Events as:

Security Event means an expected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.



An example of behaviors associated with workplace violence that are not tolerated and should be reported according to the processes outlined later in this plan include, but are not limited to:

- Physical restraint, confinement, altercations, assaults, or aggressive physical contact while on/in VTA premises, conveyances, or while engaged in VTA business;
- Verbal, nonverbal, or physical threats, including written or oral statements (whether in person or any format including electronic media), abusive language, gestures, or expressions that communicate directly or indirectly, threat of harm or intimidation;
- Bullying or coercion through suggestion of violence through words or acts, including aggressive displays of anger, non-verbal gestures such as looming, blocking movement, or invasion of personal space;
- Storage, possession, brandishing, or use of a firearm, other weapons, or ordinary items being used as a weapon while on/in VTA premises, conveyances, or while engaged in VTA business unless such possession or use is a requirement of the job and in conformity with applicable law and policy;
- Joking about acts of violence;
- Stalking (including in-person and through the internet or other technology);
- Violation of a restraining order;
- Dangerous, threatening, or unwanted horseplay;
- Loud, disruptive, or angry behavior or language that is not part of the typical work environment;
- Blatant or intentional disregard for the safety or well-being of others;
- Any other act that a reasonable person would perceive as a threat of violence.

Domestic violence, while generally originating in the home, can extend into the workplace and impact workplace safety and the productivity of victims and co-workers. VTA will not tolerate acts of domestic violence perpetrated by or against any transit workers while in VTA offices, facilities, work sites, vehicles, or while conducting VTA business. This includes the display of any violent or threatening behavior that is likely to result in physical or emotional distress or injury or otherwise places a victim's safety or productivity at risk. Upon knowledge that a transit worker is being stalked, harassed, threatened, or abused and that the risk has or may come into the workplace, the threat will be subjected to the same evaluation procedure as any other workplace violence threat.

Investigations into security events may identify workplace violence security risk hazards, resulting in the need for a Corrective Action Plan (CAP). For tracking, VTA staff track hazards identified through the course of investigations through VTA's Hazard Management Program (HMP). Hazards generated through this plan will be labeled as a "Workplace Violence Security Risk Hazard."

This WVPP applies to all transit workers with the goals, objectives, and responsibilities described in this plan to ensure that accountability for VTA's WVPP is made clear throughout the organization.

## **1.2 Workplace Violence Prevention Plan Limitations**

VTA's WVPP does not replace or supersede established criminal law or statutes. Reports of workplace violent crimes will be reported to law enforcement for criminal investigation. This plan does not apply to acts deemed lawful for self-defense or the defense of others.

While many existing policies and procedures support the prevention of workplace violence, this WVPP is designed and intended to be separated from the following:

- Safety hazards or safety events are directly covered by VTA's Public Transportation Agency Safety Plan (PTASP).
- Any emergency policies or procedures directly established by VTA's Emergency Operations Plan (EOP)
- Any policies or procedures directly established by VTA's System Security Plan (SSP)
- Domestic violence incidents that do not carry over into or are not associated with the workplace.
- A nonphysical workplace incident that qualifies as Title VI and Title VII incidents that fall under the investigatory jurisdiction of VTA's Accessibility, Civil Rights, and Equity (ACRE) Department.

### **1.3 Workplace Violence Prevention Plan Policy Statement**

VTA is committed to ensuring the safety and well-being of its transit workers, to providing an environment free of violence or threats of violence, and to safeguarding all transit workers whom the VTA controls or directs and directly supervises on the job to the extent that workers are exposed to security risks specific to their worksite and job assignment.

VTA prohibits and will not tolerate workplace violence by any transit worker or third party, including customers, clients, vendors, visitors, parents, students, or others, either at the workplace, in or on VTA property or at VTA-sponsored events.

This Workplace Violence Prevention Plan ("WVPP" or "Plan") is intended to supplement the general Injury and Illness Prevention Program ("IIPP") required by the T8 California Code of Regulations (CCR) § 3203. This Plan is in effect at all times in all work areas and is intended to be specific to the hazards and corrective measures for each work area and operation.

The WVPP shall be available to all transit workers, authorized employee organization representatives, and regulatory agencies with oversight authority.

VTA shall provide all safeguards required by law and regulation, including providing equipment and training at no cost to the employee, at a reasonable time and place for the employee, and during the employee's paid time.

The primary objective of the WVPP is to prevent and eliminate workplace violence as follows:

- Establish and maintain an effective WVPP;
- Provide a safe working environment;
- Establish policies, training, and communications to improve workplace violence prevention;
- Provide written records of workplace violence incidents and investigations in accordance with the Plan.

VTA ensures that all transit workers comply with the rules and work practices that are designed to make the workplace more secure and do not engage in threats or physical actions that create a workplace violence security risk hazard for others in the workplace, including at a minimum:

- Training transit workers, including supervisors and managers, in the provisions of VTA's



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- Effective procedures to ensure that supervisory and nonsupervisory transit workers comply with the WVPP by the provisions outlined in VTA Policy #410 “Standards of Conduct.”
- Providing retraining to transit workers whose performance or behavior is deficient with the WVPP.
- Recognizing transit workers who demonstrate safe work practices that promote the WVPP in the workplace by acknowledging acts through memorandums, emails, and certificates of recognition issued by management.
- Holding all Transit Workers accountable in compliance with the WVPP by all applicable VTA policies including VTA policy #410 “Standards of Conduct”, #420 “Employee Discipline Policy”, #420.1 “Employee Discipline Policy Non-Rep”, and #540 “Grievance Policy”.

VTA hereby authorizes and supports the establishment, implementation, and maintenance of this Plan and the documents/forms within it. VTA is committed to a culture of security and violence prevention. These policies and procedures will positively change the workflow, business operations, and overall health and security of VTA’s employees and are endorsed by the General Manager/CEO.

DocuSigned by:  
  
 \_\_\_\_\_  
 General Manager/CEO / Accountable Executive

6/26/2024  
 \_\_\_\_\_  
 Date



## 2.0 Introduction

The WVPP is VTA's agency wide plan accounting for all transit workers, guests, and customers, and applicable to all VTA properties and jurisdictions. The WVPP is developed to fulfill Title 49 Code of Federal Regulations (CFR) Part 673, and California Labor Code 6401.7 & 6401.9 which mandates the establishment of a Workplace Violence Prevention Plan.

This plan applies to all transit workers that work on behalf of VTA. The goals, objectives, and responsibilities described in this plan ensure that VTA's response to workplace violence is communicated in a clear and understandable manner throughout the organization.

VTA's WVPP places accountability and responsibility at the top levels of the organization. That accountability is shared with all employees, labor representatives, and contractors who perform VTA work. Two new committees have been formed and authorized under the WVPP. The Workplace Violence Prevention Plan Review Committee (WVPPRC) is a collaborative labor and management committee that supports WVPP plan development and maintenance, training development and implementation, and hazard identification and correction. The Threat Assessment Team (TAT) is a senior and executive level team whose major role includes timely and contemporaneous intake, investigation and resolution of workplace violence incidents. Both of these committees are chaired by the Chief of System Safety & Security who is identified in the plan as the accountable person at VTA for workplace violence management.

This WVPP has been reviewed and approved by the General Manager/Chief Executive Officer (GM/CEO) of VTA, who has committed on behalf of the agency to providing all necessary resources to sustain and implement this plan. The plan applies to all organizational units of VTA. The goals, objectives, and responsibilities described in this plan demonstrate VTA's commitment to a violence free workplace.

## 3.0 Agency Responsibilities

### 3.1 Organizational Authorities, Accountabilities, and Responsibilities

The following sections detail the authorities, accountabilities, and responsibilities of VTA's Board of Directors, executive staff, management, supervision, and all other transit workers. This section also outlines the lines of authority VTA uses to manage the WVPP and all relevant processes.

#### 3.1.1 Board of Directors

VTA is governed by its Board of Directors, the agency's legislative policy-making body. The Board of Directors consists of eighteen (18) members (twelve (12) voting members and six (6) alternates), all of whom are elected City and County officials appointed by the jurisdictions they represent. The Board of Directors is responsible for providing policy direction and governance and ensuring that the needs of the residents of Santa Clara County, VTA patrons, VTA transit workers, and other stakeholders are reflected in VTA's policies. VTA's Board of Directors will receive informational reports related to this plan and relevant activities.

#### 3.1.2 General Manager/Chief Executive Officer

VTA's GM/CEO is ultimately accountable for ensuring that VTA provides a violence-free workplace for all transit workers. The GM/CEO is also responsible for implementing the WVPP and deploying the human and capital resources necessary to manage this plan throughout the agency. In this role, the GM/CEO, in coordination with the Chief of System Safety & Security, is responsible for ensuring the development, implementation, and maintenance of VTA's WVPP and associated activities through:

- Promotion of a violence-free workplace as a value of the organization and promotion of the WVPP is occurring promptly.
- Ensuring that sufficient resources are allocated to the activities outlined in WVPP.
- Implementing all policies and directives VTA's Board of Directors established to further a violence-free workplace.
- Developing a strategic vision for the organization that helps promote the values and interests associated with the WVPP.

#### 3.1.3 Assistant General Manager/Chief Financial Officer

The Assistant General Manager/Chief Financial Officer (AGM/CFO) oversees VTA's Finance, Budget & Real Estate Division, with executive oversight of VTA's core business functions to ensure ongoing fiscal accountability. In this role, the AGM/CFO is responsible for supporting the WVPP and allocating the financial resources required to implement the plan. The Assistant General Manager/Chief Financial Officer is responsible for:

- Supporting the Technology Department with the necessary resources to implement its role under the WVPP, including supporting the needs required by the WVPP in creating an electronic Database.

#### 3.1.4 Chief People Officer

The Chief People Officer, supported by a Deputy Director of Human Resources, oversees VTA's Human Resources Division, including Employee Relations, Workforce Development & Employee Experience (WD&EX), and Accessibility, Civil Rights, and Equity (ACRE). The Chief People Officer is responsible for:

- Coordinating WVPP labor issues with collective bargaining units and employees.



- Providing Employee Relations with the necessary resources to implement its role under the WVPP, including supporting the functions and responsibilities of the TAT.
- Providing WD&EX with the resources necessary to educate transit workers and promote WVPP awareness through ongoing communications.
- Directing and managing staff in the agency-wide training and education of transit workers about the WVPP, including initial training during New Employee Orientation (NEO).
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace through communications, including certificates of recognition.

### **Employee Relations**

The Employee Relations department is responsible for negotiating and administering collective bargaining agreements with labor organizations and applying VTA policies and procedures with non-represented employees. Additionally, the department manages discipline, grievance, and arbitration processes. Employee Relations will organize and support VTA's TAT and handle disciplinary matters relating to Security Events documented through the WVPP. Employee Relations supports VTA departments and functions with individualized consultation regarding on-going transit worker workplace violence issues.

### **Workforce Development & Employee Experience (WD&EX)**

Workplace Development & Employee Experience supports VTA's commitment and investment in developing our transit workers by the design, development, and implementation of training programs, including NEO, the Employee Selection Process Training, and the WVPP. All training is done in partnership with Divisions across the Agency and tracked in VTA's centralized Learning Management System.

### **Accessibility, Civil Rights, and Equity (ACRE)**

VTA's Accessibility, Civil Rights, and Equality (ACRE) role in WVPP is supportive. The ACRE Manager coordinates with Employee Relations and the TAT to either refer, or to receive information about employee workforce matters that require investigation.

### ***3.1.5 Office of General Counsel***

The Office of the General Counsel is responsible for:

- Defending VTA in all legal proceedings.
- Processing Public Records requests filed with the agency.
- Serving a role in the TAT and supporting establishing and implementing the Temporary Restraining Order Program.
- Ensuring that contracts contain the necessary language to conform with the requirements outlined in the WVPP.
- Evaluating legal questions that arise from contractors/vendors regarding their requirements under VTA WVPP as it relates to contracts.
- Determining breach of contract with regard to compliance with the WVPP.
- Ensuring employee requests for records under the WVPP are processed appropriately.



### **3.1.6 Chief of System Safety & Security**

VTA's Chief of System Safety & Security is designated as the WVPP Administrator and is responsible for the implementation and maintenance of the WVPP, including coordination with the Threat Assessment Team (TAT) of delivering the Workplace Violence Prevention Plan and the program of supporting activities. The Chief of System Safety & Security may designate a designee to help facilitate associated duties and responsibilities. The Chief of System Safety & Security is also responsible for:

- Creating programs, policies, and procedures relevant to this plan that contribute to creating and implementing the WVPP.
- Developing associated working groups such as but not limited to the TAT.
- Serving on panels or working groups associated with the WVPP.
- Providing the necessary resources and support to implement corrective actions associated with findings from investigations related to the WVPP.
- Ensuring reporting methods associated with the WVPP are active and accessible as pertinent legislation requires.
- Ensuring processes are in place to perform post-incident analysis of workplace violence incidents.

#### **System Safety & Security Division**

The System Safety & Security Division supports the efforts of the WVPP, which may include but are not limited to:

- Serving on panels, groups, or committees associated with the WVPP.
- Assisting in any investigative processes as required.
- Assisting with the documentation and reporting of incidents associated with the WVPP.
- Monitoring and communicating regulatory changes that impact or require revision or changes to the WVPP and associated processes and procedures.
- Assisting with the facilitation of any regulatory audits associated with the WVPP.
- Serve as the liaison between VTA, law enforcement/intelligence agencies, and external regulatory agencies.
- Ensuring employer reporting responsibilities to Cal/OSHA are initiated as required by California Code of Regulations, Title 8, Section 342(a) Reporting Work-Connected Fatalities and Serious Injuries.
- Assisting with other duties as directed by management.

### **3.1.7 Chief Operating Officer**

VTA's Chief Operating Officer (COO) is responsible for:

- Directing Operations Workforce Development & Joint Workforce Investment to train and educate all transit workers in their purview on the WVPP.
- Ensuring the necessary resources and work hours are allocated to sufficiently implement training associated with the WVPP and any continued education and outreach required.





- Supporting communication surrounding WVPP concerns through the Operations Control Center (OCC).

### **3.1.8 Chief Communications Officer**

The Chief Communications Officer is responsible for the following:

- Supporting communication and education efforts of the WVPP to all transit workers throughout the agency.
- Responsible for developing, maintaining, and disseminating a communications plan to support the WVPP.
- Serve as a liaison for any public-facing external communication that VTA's Board may require from Directors, General Manager/CEO, or external media requests.

### **3.1.9 Division/Department Heads, Managers, Supervisors, Foreperson, Leads, Employees, and Contracted Staff**

All VTA positions responsible for overseeing the duties of any transit workers are responsible for overseeing workplace activities, including implementing and maintaining the provisions and requirements set forth by the WVPP in their areas of responsibility. At multi-employer settings or worksites Division/Department Heads and Contractors will work jointly together to coordinate day-to-day WVPP program support, guidance, and training to transit workers including processing reports of workplace violence and supporting the mitigation of security risk hazards in accordance with the WVPP, HMP, and established procedures.

### **3.1.10 Transit Workers**

Under VTA's WVPP, Transit Workers are responsible for adhering to the WVPP and all provisions set forth by supporting programs and associated plans, including but not limited to reporting workplace violence concerns and incidents outlined in this plan.

## **3.2 Key Organizational Entities/Committees**

VTA executive leadership has designated two (2) principal committees with distinct roles in supporting the Chief of System Safety and Security. The joint labor-management Workplace Violence Prevention Plan Review Committee (WVPPRC) is responsible for the intake, review, and assessment of workplace violence security risk hazards. Their work is coordinated with a senior management-led Threat Assessment Team (TAT) that investigates workplace violence incidents, performs post-incident response, and provides security risk hazard identification feedback. The two committees provide the backbone capability for a comprehensive, sustainable method of routinely accepting and responding to reports of workplace violence, communicating with employees regarding workplace violence matters, responding to actual and potential emergencies, developing and providing practical training, and Identifying, evaluating, and correcting workplace violence hazards.

### **WVPP Review Committee (WVPPRC)**

The Workplace Violence Prevention Plan Review Committee (WVPPRC) at VTA is not just a group but a collaborative effort. It brings together a diverse group of transit workers, managers, supervisors, and authorized bargaining unit representatives. Their primary task is to continuously identify, evaluate, and correct workplace violence security hazards, considering the various classes and jobs of transit workers. This collaborative approach ensures a comprehensive and effective response to workplace violence, highlighting the importance of collective responsibility in maintaining a safe work environment.

### **Threat Assessment Team (TAT)**

The Threat Assessment Team (TAT) at VTA has a clear mission to provide resources and a defined process for responding to identified and/or reported workplace violence incidents or concerns. Their systematic and





disciplined approach to evaluating and improving the effectiveness of governance, threat management, and control processes is vital to the Agency's objectives. The TAT collaborates closely with the Chief of System Safety and Security to deliver the Workplace Violence Prevention Plan and its program support activities.

### **3.3 WVPP Employee Involvement and Plan Review**

VTA's WVPPRC is facilitated under the direction of the WVPP through the Chief of System Safety and Security. The System Safety & Security Division, following Procedure SSS-SAC-PR-3005, is responsible for facilitating VTA's WVPPRC as required by the WVPP. The WVPPRC is a formal committee that includes representation from VTA's frontline employee representatives and management representatives. The WVPPRC is responsible for reviewing VTA's WVPP and participating in identifying, evaluating, and correcting workplace violence security hazards, designing and implementing training, and reviewing workplace violence incidents reported on the Violent Incident Log.

Any impacts this plan has will be addressed in accordance with guidelines for MOUs or CBAs.

## 4.0 Workplace Violence Prevention Plan

### 4.1 Plan Development, Review, and Updates

#### 4.1.1 Plan Development

California Senate Bill SB553 addressed workplace safety concerning violence prevention and restraining orders. This legislation, sponsored by Senator Dave Cortese, aimed to enhance employee protections by implementing measures to prevent workplace violence. The bill mandated employers to develop and maintain a workplace violence prevention plan, outlining procedures to identify and mitigate potential risks. Additionally, SB-553 empowered employees to seek restraining orders against individuals who posed a credible threat of violence in the workplace. By requiring proactive measures and legal recourse, the bill sought to create safer work environments and mitigate the risks associated with workplace violence.

On September 30, 2023, the California Governor signed into law SB553, codified into California Labor Code section 6401.9, requiring employers in the State of California to maintain an effective written Workplace Violence Prevention Plan. This requirement will be in effect and enforceable as of July 1, 2024. Elements of the plan are to include:

- Identifying who is responsible for implementing the plan
- Involving employees and their representatives
- Accepting and responding to reports of workplace violence and prohibiting employee retaliation
- Communicating with employees regarding workplace violence matters
- Responding to actual and potential emergencies
- Developing and providing effective training
- Identifying, evaluating, and correcting workplace violence hazards
- Performing post-incident response and investigations

VTA's WVPP is designed to comply with the requirements outlined in LC sections 6401.7 and 6401.9.

#### 4.1.2 Plan Review and Updates

In accordance with LC sections 6401.7 and 6401.9 this plan will be reviewed and revised as described below to determine if updates are required. Ensuring compliance with the agency's WVPP and all processes established to fulfill this requirement is a key responsibility of VTA's GM/CEO, executive staff and management.

VTA's System Safety and Security Division, in cooperation with VTA's Chief People Officer, will coordinate reviews of the WVPP. This will begin with a notification to all applicable VTA Management that they must review the WVPP and provide comments and feedback regarding suggesting revisions to it. The plan will be reviewed and revised based on the following elements:

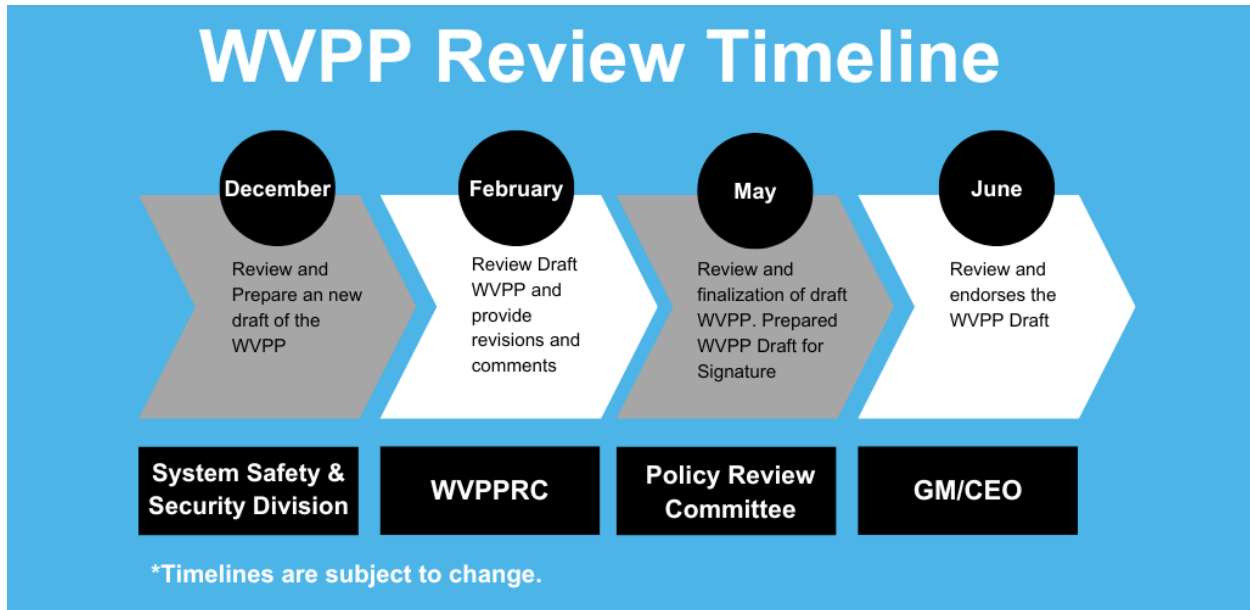
- At least annually
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident
- As needed

The WVPPRC will review updated drafts of the WVPP in accordance with section 3.3 of this plan. Upon completion of a WVPP revision the System Safety and Security Division will submit a policy draft to VTA's Policy Review Committee per VTA Policy #310.010.

**4.1.3 Plan Review Timeline**

VTA's Policy Review Committee is responsible for receiving all drafts of the WVPP and ultimately reviewing and approving the WVPP.

Table 4.1: WVPP Annual Review and Approval Timeframe



**4.1.4 Plan Endorsement**

Following the WVPP review process, the WVPP will be presented to VTA's GM/CEO for plan approval and endorsement. Once approved, the plan will be made available throughout the agency by the System Safety & Security Division and circulated in compliance with section 4.4 of this plan.

**4.2 WVPP Coordination**

VTA shall coordinate the implementation of the WVPP with all transit workers, including all third-party employers/contracted vendors and volunteers, at a VTA workplace. This coordination ensures that all individuals working under the classification of transit workers understand their respective roles under the WVPP and their responsibilities of reporting workplace violence in accordance with the WVPP.

VTA shall ensure that if a transit worker experiences a security event classified as workplace violence, the event is recorded in Appendix D (Violent Incident Log). Any reports of workplace violence communicated by an employer contracting transit workers to VTA will be received by the TAT and processed in accordance with this plan and the TAT procedures. This process is further discussed in Appendix C.

VTA observes all duties to inform external employers that may support VTA with transit workers and will coordinate with these employers to disseminate pertinent documentation as required by regulatory reporting.

**4.3 WVPP Communication**

Communication of the WVPP with all transit workers is a critical component in keeping all transit workers engaged with the WVPP process. VTA's process for communication of the WVPP is designed to



encourage and facilitate a continuous flow of information between management, transit workers, and others in relation to the WVPP in a form that is readily understandable by all transit workers and consists of one or more of the following:

- New Employee Orientation (NEO) including instruction on workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Through Meetings, Committees, Tailgates, Toolbox talks, and other gatherings facilitated by VTA that address security-related concerns or continue messaging on the WVPP.
- Effective communication between transit workers and management about workplace violence prevention and violence concerns, ensuring that management can communicate effectively and in a manner understandable to transit workers.
- Continued communications through posted or distributed workplace violence prevention information via communication boards and video information screens at various workplaces.
- Through VTA's Intranet titled "The Hub".
- Mass notification systems utilized by VTA.
- Mailed In Print to each Transit Worker's address on file.
- Agency-wide Memorandums, Notices, or Bulletins.
- Communication boards and video information screens are located in various workplaces.
- How can transit workers report workplace violence concerns to VTA, employers, or law enforcement without fear of reprisal or adverse action?
  - When encountering an immediate threat of violence, contact 9-1-1 Law Enforcement Services/ VTA Contracted Security Services and then contact their immediate management when it is safe. Transit Workers operating a transit vehicle, my reference OPS-PL-0001 regarding the use of Personal Electronic Devices (PED).
  - File a written report using the VTA Violent Incident Report Form (Appendix E) or submit a verbal report of workplace violence to their immediate supervisor or Management. All transit workers working in a position of supervision, management, or executive management must be trained in the WVPP and be accountable for handling any reports of workplace violence reported to them. Any Transit Worker can approach and report workplace violence to any Transit Worker working in a position of Supervision, Management, or Executive Management.
  - Filing a written report using Appendix E and following the submission process detailed on the form.
  - Contact VTA's Workplace Violence Prevention Plan Hotline directly at (408) 321-2397 or email [ERComplaints@vta.org](mailto:ERComplaints@vta.org)
  - To any VTA Supervision, or Executive Management or VTA Security Personnel.
- Transit workers 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. Transit workers' concerns will be investigated promptly. They will be informed of the results of the investigation and any corrective actions to be taken with follow-up communication in person, by telephone, or by electronic mail from the party responsible for managing the investigation.

- Updates on the status of investigations and corrective actions are provided to transit workers through email and at safety meetings. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.
- Updates during daily/weekly/monthly/quarterly meetings with other transit workers in the building (at or near and around the same worksite) to discuss the plan and any updates. These meetings could involve sharing updates to the plan, discussing recent incidents, and coordinating training sessions.
- Sharing training materials and incident reports with other transit workers to ensure a coordinated response to incidents. This could involve sending other transit workers copies of training materials and incident reports.

#### **4.3.1 Communication of the WVPP to Transit Workers (Internal Employees)**

VTA shall communicate the WVPP with transit workers to educate them on their respective roles and responsibilities under the plan through the following methods:

- All transit workers will be trained on the WVPP through NEO at the start of their employment. WD&EX will provide training for existing transit workers and any subsequent refresher training.
- Having the WVPP readily available to all transit workers through VTA's intranet, with subsequent hard copies of the WVPP being made available upon request through VTA's System Safety & Security Division.
- A hard copy of the WVPP is being mailed out to all Transit Workers' addresses on file.
- Communication through various mass notification systems utilized by the agency. Some methods include communications through agency-wide memorandums, notices, and bulletins distributed to Transit Workers.
- Posted communication boards, including electronic information screens, located throughout the various properties at VTA.

#### **4.3.2 Communication of the WVPP to Transit Workers (Contractors/Other)**

The contractors/vendors or others working as a transit worker for VTA will receive initial workplace violence communications and training on the WVPP by WD&EX and Workforce Development & Joint Workforce Investment before starting work at a VTA Workplace. The training will be made continuously available and will be facilitated for all existing contractors/vendors or others working as transit workers. All transit workers, regardless of their employer, are required to abide by the provisions covered in the WVPP, which meets all requirements under LC 6401.7 and 6401.9. Communication of the WVPP is coordinated with all transit workers who are not in-house employees and their respective contractors/vendors through the following methods:

- Ensuring all third-party employees/contracted vendors receive and review the WVPP when working at VTA sites.



- Having the WVPP readily available to all transit workers through VTA's intranet, with subsequent hard copies of the WVPP being made available upon request through VTA's System Safety & Security Division.
- Providing written notice of WVPP responsibilities to contractors/vendors performing activities at VTA work sites
- Maintaining a list of assigned third-party employers/contracted vendors that employ transit workers in VTA's workplaces; facilitating communications with these groups; coordinating training for transit workers with WD&EX and/or Workforce Development & Joint Workforce Investment.
- The agency utilizes various mass notification systems to ensure effective communication. These methods include agency-wide memorandums, notices, and bulletins distributed to Transit Workers, ensuring everyone is well-informed and involved.
- Posted communication boards, including electronic information screens, located throughout the various properties at VTA.

#### **4.4 WVPP Training**

Implementation of VTA's Workplace Violence Prevention Plan Training begins with a comprehensive strategy designed to ensure employee safety and awareness throughout the year. VTA's WD&EX will conduct instructor-led trainings that are interactive and scenario-based, aimed at equipping transit workers with practical skills to identify and respond to potential threats. Additionally, online modules will be available for flexible learning, accessible anytime and anywhere. Print materials such as brochures and posters will be strategically placed to reinforce key concepts and reporting procedures. Clear and accessible reporting flow charts will guide transit workers through the steps of reporting incidents or concerns, ensuring timely intervention and support.

The following section highlights plans for the roll out of the WVPP for operators and maintenance department transit workers:

##### **Operators**

- WVPP Training will be distributed either as a tri-fold document or an Operations Training Advisory. If necessary, it will be distributed via Operator Mail to ensure there is a signature upon receipt of the document.
- The document will include directions for Operators to reach out to their division supervisors if they have any questions.
- A QR code will be included on WVPP documents linking operators workers to more information on the HUB and frequently asked questions.
- Additional copies of the WVPP of the document will be available in the dispatch room for operators to collect and review.
- Posters will be displayed throughout the yards advising.
- Digital Information Boards will have messaging about the WVPP.
- Clever Device Messages can be sent via message that goes directly to Operators when driving.
- Training will be included in the proposed 3 Operator Training day.

##### **Maintenance**



- WVPP Training will be a safety tail gate similar to the safety tail gates that are provided per VTA's IIPP.
- Each supervisor will be responsible for providing the information to their staff.
- Staff members will be required to sign a roster showing receipt of the training.
- A QR code will be included on WVPP documents linking maintenance workers to more information on the HUB and frequently asked questions.
- Training will be on-going similar to VTA's IIPP safety tail gate training.

These implementation efforts will be integrated into VTA's annual training calendar, along with other ongoing Workplace Violence Prevention, De-escalation, First Aid/CPR/AED, and Threat Assessment Team trainings, ensuring consistent updates and reinforcement of VTA's commitment to a safe workplace environment. During the annual training cycle VTA transit workers will first be introduced to the WVPP as part of their initial NEO or onboarding training. This training not only educates transit workers on the WVPP and its location on the agency's online resource library, the Hub but also familiarizes them with the reporting system contained within the WVPP and the methods of reporting security events that qualify as workplace violence. The Hub features a dedicated page for reporting workplace violence, making the plan easily accessible to all transit workers.

Below is VTA's tentative instructor-led hybrid training schedule for 2024. Each year during the annual WVPP update the schedule of upcoming training dates will be identified.

Session 1 and 2: Tuesday, July 16 (Hybrid)

Session 3: Wednesday, July 24 (Hybrid)

Session 4 and 5: Thursday, August 1 (Hybrid)

Session 6 and 7: Wednesday, August 14 (Hybrid)

Session 8 and 9: Thursday, August 29 (Hybrid)

Session 10 and 11: Thursday, October 24 (Hybrid)

Session 12 and 13: Wednesday, November 13 (Hybrid)

Session 14 and 15: Tuesday, December 10 (Hybrid)

VTA shall provide training to all transit workers under the following provisions:

- At a transit worker's time of hire, provided through VTA's New Employee Orientation (NEO) or the onboarding period, contractors/others working in the capacity of a transit worker begin working at a VTA workplace. VTA is required to provide WVPP training to all Transit Workers regardless of classification.
- When the WVPP is first established and adopted by VTA. VTA will facilitate an education campaign and training documenting the acknowledgment of training and receipt of the WVPP for all transit workers working at VTA.
- VTA will annually offer all transit workers training on the WVPP to ensure they understand and comply with the plan. VTA may facilitate this training through methods the agency finds acceptable, such as Online or In-person instructor-led training.
- Whenever a new or previously unrecognized workplace violence hazard has been identified, and changes are made to the WVPP. The additional training may be limited to addressing the new workplace violence hazard or modifications to the WVPP, specifically in this instance.





#### **4.4.1 Training Requirements**

VTA is required and will provide its transit workers with training and instruction on the WVPP and, at minimum, will cover the following areas:

- VTA's WVPP, how to obtain a copy of the WVPP at no cost to the Transit Worker, and how to participate in VTA's WVPPRC.
- How to report security events qualifying as workplace violence, threats, or concerns to the VTA without fear of reprisal.
- Workplace violence hazards specific to the Transit Worker's workplace, any corrective actions implemented to mitigate or reduce workplace violence, how to seek assistance to prevent or respond to workplace violence, and strategies to avoid physical harm.
- How to access records upon request and without cost for examination and copying within fifteen (15) calendar days of a request, including records of security events qualifying as workplace violence, associated workplace violence hazards with mitigations, training records, and Appendix C.
- Methods Transit Workers can use to ask questions or receive further guidance on the WVPP through a designated process to facilitate questions and answers regarding the WVPP.
- How to recognize workplace violence hazards, including the risk factors associated with the four types of workplace violence.
- The process in which a Transit Worker can seek immediate assistance when dealing with a security event qualifying as workplace violence, including the reporting process and post-resolution.
- Training for Transit Workers regarding methods for preventing, reducing, or avoiding security events qualifying as workplace violence and strategies to avoid physical harm in conjunction with the four (4) types of workplace violence covered in the WVPP.
- Post-event trauma counseling for Transit Workers desiring such assistance.
- How to access VTA's EOP, which covers VTA's emergency plan, including evacuating from VTA workplaces.
- Additional training may be identified as necessary through the process established in the WVPP.

#### **4.4.2 Reasonable Accommodations for Training**

VTA will provide all training on the WVPP to all Transit Workers while working at a VTA workplace. The training used by VTA will be appropriate in content and vocabulary for the educational level, literacy, and language of the Transit Workers receiving it.

#### **4.5 Reporting Workplace Violence**

VTA requires all Transit Workers to immediately report workplace violence concerns and incidents (including threats of violence), as described in Section 1 of the WVPP. VTA shall maintain a record of all reported incidents.

#### **4.5.1 Retaliation-Free Reporting**

No Transit Worker will be subject to any discipline, retaliation, or reprisal for reporting a concern regarding workplace violence or any injury resulting from workplace violence to VTA or law enforcement. Transit





Workers, including Supervision, Management, or Executive Management, who retaliate against a Transit Worker for reporting a concern of workplace violence or any injury resulting from workplace violence are subject to discipline and/or up to and including termination.

Depending on the nature and content of the workplace violence report, or any report made to law enforcement or VTA, reporting does not absolve the Transit Worker has committed illegal acts or willful and deliberate disregard of VTA Policy 410 (Standards of Conduct) and may be subject to reasonable discipline.

#### **4.5.2 Ways to Report**

VTA has implemented the following process of reporting when a Transit Worker raises a concern about workplace violence:

- When encountering an immediate threat of violence, contact 911 Law Enforcement Services. Then, contact their immediate supervision/management when it is safe. Transit Workers operating a transit vehicle may reference OPS-PL-0001 regarding the use of Personal Electronic Devices (PED).
- File a written report using the VTA Violent Incident Report Form contained in Appendix E or submit a verbal report of workplace violence to their immediate Supervision or Management. All transit workers working in a position of supervision, management, or executive management must be trained in the WVPP and be accountable for handling any reports of workplace violence reported to them. Any Transit Worker can approach and report workplace violence to any Transit Worker working in a position of Supervision, Management, or Executive Management.
- Filing a written report using Appendix E and following the submission process detailed on the form.
- Contact VTA's Employee Relations Hotline at (408) 321-2397 or email [ERComplaints@vta.org](mailto:ERComplaints@vta.org).
- To any VTA Supervision Executive Management or VTA Security Personnel.

#### **4.5.3 How to Process a Report of Workplace Violence**

All transit workers in a position of supervision, management, or executive management must be trained in the WVPP and be accountable for handling any workplace violence reported to them.

The Transit Worker submitting the report may ask that the Violent Incident Report Form (Appendix E) be completed on their behalf.

Once the Violent Incident Report Form (Appendix E) is completed, it must be submitted following the process outlined on the form. The Transit Worker's supervisor and manager are responsible for confirming that the VTA WVPP reporting system has received the reported incident. Once submitted, the Supervisor or Manager of the Transit worker who submitted the report will follow up with the TAT and assist as needed in any investigatory process.

#### **4.5.4 WVPP Report Process Flow**

VTA has implemented the following process of reporting when a Transit Worker raises a concern about workplace violence:

1. Report is filed/received
2. An affected employee initiates the report through any of the multiple readily available methods identified in the WVPP.



3. The report is received by either the employee's direct supervisor or manager, who is accountable for obtaining the report on behalf of the VTA.
4. The supervisor or manager initiates immediate actions, including but not limited to summoning law enforcement and providing priority notice to the TAT.
5. Report referred to TAT
6. Report is received and initially assessed by the Intake Evaluation Team within Human Resources Employee Relations or by a TAT member.
7. A mass notification system activates TAT members during an emergency.
8. TAT conducts follow-up using established checklists and flow charts.
9. TAT Implements Emergency Actions (as determined).
10. TAT Implements Non-Emergency Actions (as determined). If the reported situation does not present an immediate threat to the physical safety and well-being of others
11. TAT investigation either completed or referred to law enforcement
12. Notification to law enforcement based on threat assessment
13. Decision to implement ongoing monitoring or close investigation
14. TAT returns closes the reporting loop
15. Follow up with the reporting party and provide an update
16. TAT documents event on Violent Incident Log

**Workplace Violence Emergency Reports:**

In any potentially life-threatening situation, the following immediate response procedures should be followed:

- Call 911
- Contact VTA's System Safety & Security Department
- Implement applicable response procedures and plans (Active Shooter Plan, Lock Down Plan, Notification System/Alert Activation, Threat Assessment Team, Incident Management/Support Team, etc.)
- Ensure all internal and external notifications have occurred.
- Ensure responders have access to facilities and detailed information on the situation, including applicable updates—safety is paramount.
- As indicated by the situation and local response plan, avoid the danger zone by moving to a safer location within the facility or away from the facility itself.



- Use available technology to monitor unresolved situations and communicate real-time updates to affected personnel and emergency responders to assist decision-making.
- Deny an attacker access to additional victims by notifying those within potential danger zones to escape or seek shelter (per protocols and training). Whenever possible, take action to prevent or restrict a perpetrator's movement into other areas or effectively barricade portals to areas where personnel have taken temporary refuge—consider activating lockdown or similar processes and procedures.
- Implement lawful defensive measures.
- Provide first aid for injured persons when safe to do so.
- Comply with requests from responders.
- Account for all personnel and attempt to locate anyone missing or unaccounted for.
- Engage additional resources as needed, including:
  - Law Enforcement
  - Behavioral Specialists
  - Employee Assistance Program
- Develop recommendations for appropriate responses to resolve an incident and assist relevant management or employee representatives with implementation.
- Perform continuous monitoring and follow-up actions as appropriate.
- Debrief/conduct Post-Incident Analysis to evaluate the effectiveness of the WVPP and incident management process, identify opportunities for improvement, and assign a responsible party to develop and implement corrective action plans.
- Track incidents using the Violent Incident Log as identified in the WVPP.

#### **Workplace Violence Non-Emergency Reports:**

If the reported situation does not present an immediate threat to the physical safety and healthy well-being of others, consider the following actions to manage the incident:

- Activate the Threat Assessment Team (TAT) using the notification system
- Conduct an initial gathering of information using the Violent Risk Screening Process or Threat Assessment Template
- Perform a preliminary violence risk screening based on known information- this must be repeated as new information is obtained/developed
- Develop a plan for early actions based on the initial screening

- Conduct a deeper, continued investigation and re-evaluate risk as new information is received or developed
- Based on initial information and risk assessment, determine the urgency presented by the situation, including the following potential options:
  - If the concern is unwarranted/unsubstantiated (Low Risk), manage the situation with human resources (if an employee) within established processes/policies/labor agreements
  - If some concern for violence but not significant or urgent (Medium Risk), continue with information gathering process
  - If there is a concern for violence and/or emergency risk (High Risk), consult with a third party (behavioral specialist and/or law enforcement) for assistance

**\*\*Note:** when in doubt, consider law enforcement and/or behavioral specialist intervention

- Implement additional incident management actions, such as formal violence risk assessments and other interventions.
- Engage outside resources as needed, including:
  - Law Enforcement
  - Behavioral Specialists
  - Employee Assistance Program
- Develop recommendations for appropriate responses to resolve an incident and assist relevant management or employee representatives with implementation.
- Perform continuous monitoring and follow-up actions as appropriate.
- Debrief/conduct Post-Incident Analysis to evaluate the effectiveness of the WVPP and incident management process, identify opportunities for improvement, and assign a responsible party to develop and implement corrective action plans.
- Track incidents using the Violent Incident Log as identified in the WVPP.

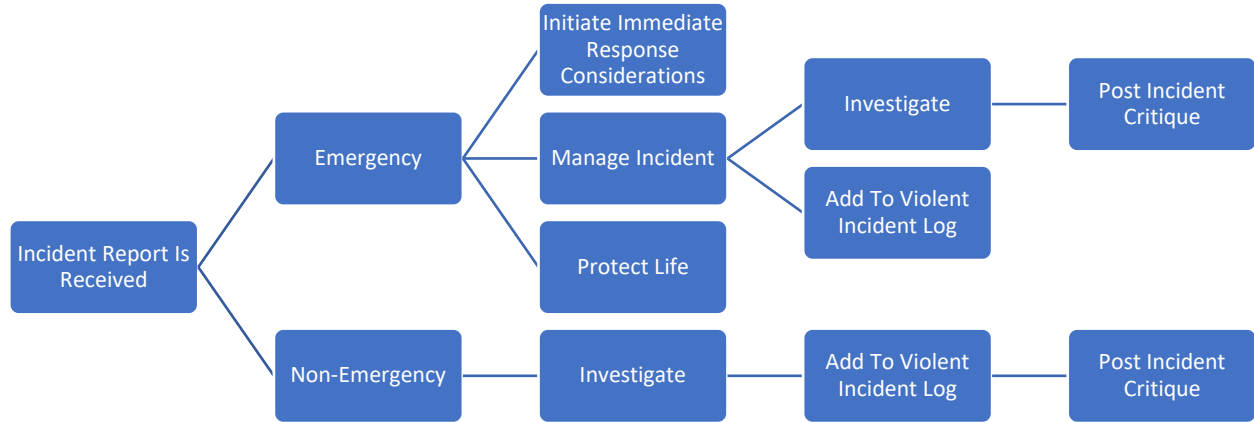


Table 4.2: WVPP Report Process Flow

*Note: Although presented linearly, emergent actions include those completed/implemented simultaneously.*



## 5.0 Workplace Violence Security Risk Hazard Identification

Part of managing security risks resulting from workplace violence is identifying hazards associated with those risks. A hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

VTA processes all hazards, including hazards associated with workplace violence, in accordance with VTA Hazard Management Program (HMP) Appendix F detailed in COS-SAF-PR-3002. The HMP describes the agency's processes for identifying, analyzing, prioritizing, and mitigating hazards to a point that is as low as reasonably practical, given cost, schedule, and performance constraints. These processes are based on U.S. Military Standard MIL-STD-882E, U.S. Department of Transportation FT00564 SMS Principles for Transit, 49 CFR Part 673, and accompanying FTA guidance.

### 5.1 Workplace Violence Security Risk Management

#### Transit Worker Reporting

All VTA Transit Workers are responsible for identifying and reporting workplace violence risks and conditions that could result in a workplace violence incident. Reporting such conditions and incidents allows for security risk assessments and evaluations. From those evaluations, hazards that require corrective actions to remove, reduce, mitigate, or lower the security risk may be identified.

Any potentially identified hazards associated with workplace violence should be reported to VTA's Safety and Security Department, Protective Services Unit.

#### Periodic WVPP Inspections

In addition to VTA transit worker reporting, periodic security inspections will be conducted to identify and evaluate workplace violence security risks and hazards.

Under SB 553 and CA Labor Code Section 6401.9, periodic inspection of VTA facilities for workplace violence security hazards is mandatory. Assessment must be conducted to identify security risks associated with any of the four types of workplace violence described in the VTA WVPP. Any inspection may require assessment for more than one type of workplace violence.

Periodic inspections will be performed by the Safety and Security Department's Protective Services Unit, overseen by the Deputy Director of Security, for all VTA workplaces, transportation conveyances, and other locations associated with VTA business in accordance with VTA's Policy #[Enter Name and Number]. The Workplace Violence Prevention Plan Review Team (WVPPRC), managed and directed by the Chief of System Safety and Security (CSS&S), shall also receive and review all agency periodic inspection reports.

Inspections shall be completed annually or as a result of events described below, which would prompt an inspection/re-inspection. The VTA has established the following process to ensure that workplace violence security risk hazards are identified and evaluated:

- Periodic security inspections/assessments shall be conducted when the WVPP is first established, whenever the VTA is made aware of a new or previously unrecognized hazard related to a workplace violence security risk, and after each agency determines that a workplace violence incident has occurred.
- The CSS&S shall review all submitted/reported concerns of potential security risk hazards by VTA's WVPP and HMP Program.

Periodic Inspections and related activity may include, at a minimum, any or all of the following:

- An evaluation of workplace exteriors and interiors based on Crime Prevention Through Environmental Design (CPTED) principles.
- Findings developed from Threat Vulnerability Assessments (TVA).
- An evaluation of established policy, procedure, and security protocols determined inefficient in light of an investigation into a security event.
- Suspicious activity reporting was collected through reporting established methods through VTA's WVPP, SSP, and HMP.
- Remodel and redesign workplace areas and the effectiveness of security countermeasures at the affected locations.
- Evaluation of security report methods made available to Transit Workers at established workplaces and ease of access (Telephones, Alarms, Speakers, Radios, etc..).
- Evaluation of emergency evacuation routes and designated safe spaces.
- Evaluation of VTA's access control system, including all policies, procedures, and supporting infrastructure.
- Trend Analysis of security reports and incidents related to workplace violence.
- Analyze and evaluate supporting contracted security services and their effectiveness.
- An evaluation of workplace communication of security programs and interactions with Transit Worker and Transit Worker representatives.
- An assessment of VTA's visitor access control policy, including freedom of movement or access for non-transit workers, including customers in non-public areas within VTA workplaces.
- Evaluation of the process for removal of discharged Transit Workers or individuals involved with a security event.

Factors specific to the VTA workplace may indicate risk for workplace violence.

- Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.
- The frequency and severity of transit workers' reports of threats of physical or verbal abuse by managers, supervisors, or other transit workers.
- The frequency and severity of threatening or hostile situations that may lead to violent acts by passengers or customers.
- The exposure of transit workers to unvetted and unscreened hostile passengers or persons using or attempting to use VTA transportation services.
- The exposure of transit workers to trespassers or other criminals while engaged in work activity.
- Access to and freedom of movement within the workplace by non-transit workers, including recently discharged transit workers or persons with whom one of our transit workers is having a dispute.
- Transit workers' skill in safely handling threatening or hostile individuals.

- Procedures for reporting suspicious persons or activities.

### **5.1.1 Responsibilities for Security Risk Hazard Identification**

All Transit Workers are responsible for adhering to the WVPP, including the responsibilities detailed in Section 3.0.

## **5.2 Security Risk Assessment**

### **5.2.1 Security Risk Hazard Identification and Investigation**

Security risk hazard identification occurs during the investigatory activities conducted through the WVPP and SSP and, in some cases, is associated with investigations or activities of the TAT.

The security risk hazard investigation process is completed by a multi-disciplinary group coordinated by the Chief of System Safety and Security, by Periodic Inspection Policy# [Enter when developed]. The evaluation of security risks related to workplace violence may utilize assessment methods including, but not limited to:

- Contacting the reporting party to gather all known information about the reported hazard.
- Conducting a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking necessary measurements.
- Conducting interviews with employees in the area to gather potentially relevant information on the reported hazard.
- Reviewing any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.).
- Contact other departments that may be associated with or have technical knowledge relevant to the reported hazard.
- Reviewing past reported hazards of a similar nature in conjunction with the Safety & Compliance Department.
- Evaluating tasks, work areas, and/or processes associated with the reported hazard.

### **5.2.3 Security Risk Hazard Rating and Prioritization**

All Security Risk Hazard ratings and prioritization are conducted in accordance with VTA's HMP and System Security Plan (SSP). This rating, alongside evidence gathered through investigation, hazards will then be logged in the Electronic Hazard Reporting Tracking System (EHRTS) by the responsible party conducting the investigation identified by the TAT, or by Protective Services. VTA uses the hazard rating process to help prioritize mitigating security risks. The HMP contains a comprehensive overview of how the security risk hazard and prioritization occurs. At times, a security risk hazard may be classified and rated at an acceptable risk level, in which the hazard will be documented but not necessarily require action to be taken- in some circumstances, this may lead to ongoing monitoring activities (MMP).

## **5.3 Security Risk Mitigation**

Mitigations will occur per the assigned prioritization described in section 5.2.3. VTA will implement the following steps in accordance with the workplace violence security risk hazard severity rating:



- Any workplace violence security risk hazard classified as “high” and that presents an imminent danger to Transit Worker will require immediate action to be taken, including but not limited to:
  - Summoning first responders to the affected location for their assistance.
  - Removing transit workers from the affected area until the workplace violence security risk hazard rating and be lowered.
  - Conferring with Executive Management to review the classified workplace violence security risk hazard rating for direction on how to proceed.
  - Implementing corrective action to reduce the workplace violence security risk hazard rating to a lower severity rating.
- Any workplace violence security risk hazard rating not classified as “high” and that does not present an imminent danger to Transit Workers will be assigned corrective actions based on a root cause analysis, with a reasonable and effective way to mitigate or reduce the workplace violence security risk hazard rating to a level that is found acceptable.

Some examples of workplace violence security risk hazard rating mitigation activities include:

- Utilizing CPTED principles in new and existing construction through the use of construction contracts and revising existing security design manuals/requirements.
- Analyze and redeploy security-related assets based on trend analysis activities.
- Improvements to existing protocols and procedures to address security risk deficiencies identified.
- Implementation and expansion of security infrastructure.
- Security assurance through active review and testing of workplace violence systems and security procedures through testing, drills, and exercises.
- Agency-wide communication campaigns and outreach to Transit Workers.
- Coordinating and reviewing emergency procedures, including reviews of emergency evacuation routes and equipment.
- Review of security-critical vulnerabilities, including cash handling facilities and storage facilities containing high-value assets.

As required by the security risk assessment results, the workplace violence security risk hazard rating will be resolved through the development and implementation of mitigations or corrective actions, which will be accompanied by a Mitigation Monitoring Plan (MMP) or CAP, respectively. Workplace violence security risk hazard rating mitigations will be developed by the HMP, Protective Services, and/or the TAT, dependent on the method in which the security risk hazard was generated and investigated.

Through a review and assessment process, the workplace violence security risk hazard status will be classified into the following three (3) categories:

- Resolved – meaning that the workplace violence security risk hazard was eliminated, and no further action is required.

- **Monitored** – meaning that the workplace violence security risk hazard was not eliminated but has been mitigated to an acceptable level of risk and will be monitored to ensure that this risk level is maintained.
- **Not Resolved** – meaning that the workplace violence security risk hazard was not eliminated, and further action is necessary to mitigate the identified workplace violence security risk hazard to an acceptable level.

The resolution of workplace violence security risk hazards identified through the WVPP and related to workplace violence will be reviewed by the WVPP Administrator or designee. If the WVPP Administrator or designee deems the hazard “Resolved,” the documentation will be updated in the EHRTS system.

If the WVPP Administrator or designee deems the hazard to be “Monitored”, an MMP will be developed and documented into the EHRTS.

If, after following corrective action, the resulting security risk hazard rating is “High” or “Serious”, the WVPP Administrator or designee is responsible for submitting all information related to the hazard to the agency’s Executive Staff to decide how the resulting risk should be addressed.

If the WVPP Administrator or designee deems the hazard to be “Not Resolved”, then the WVPP Administrator or designee is responsible for proposing a CAP. Suppose the resulting hazard rating would be “High” or “Serious”. In that case, the WVPP Administrator or designee is responsible for submitting all information related to the hazard to the agency’s Executive Staff to decide how the resulting risk should be addressed.

### **5.3.1 Mitigation Monitoring Plan (MMP)**

Workplace violence security risk hazard mitigations address the potential consequences of transit service delivery through the:

- Elimination of the workplace violence security risk hazards,
- Reduction of the likelihood of the potential consequences of workplace violence security risk hazards, and/or
- Reduction of the severity of the potential consequences of workplace violence security risk hazards if they were to occur.

MMPs are a process VTA uses to systematically track the implementation of workplace violence security risk hazard mitigations. Such mitigations may be implemented in response to workplace violence security risk hazards identified through reports of workplace violence, security or law enforcement investigations, and security inspections and walkthroughs.

### **5.3.2 Corrective Action Plan (CAP)**

CAPs address deviations in implementing requirements regarding human and/or technical resources, procedures, rules, agency policies, plans, or procedures. CAPs are similar in concept to workplace violence security risk mitigations but are generally used to systematically track, monitor, and verify long-term mitigations, require significant capital or human resources to implement, and/or require significant changes to the organization or related plans, policies, procedures, and training. At a minimum, CAPs must address findings identified through reports of workplace violence, security or law enforcement investigations, and security inspections and walkthroughs.

## 6.0 Emergency Response Procedures

The VTA maintains a Facility Emergency Plan (SSS-SAF-IIPP-0801) as part of the Injury and Illness Prevention Plan (IIPP), which is required by California Code of Regulations (CCR) Title 8 section 3203, and outlines procedures and guidelines for Transit Workers, including Superintendents, Department Managers, Emergency Response Team (ERT) Members and other specially trained employees in responding to a disaster/emergency at VTA facilities. The plans are located with the Facilities Maintenance Representatives and the Environmental, Health and Safety (EH&S) System Safety & Security unit at River Oaks and on the VTA Hub. ERT members and VTA staff will utilize the National Incident Management System (NIMS) Incident Command System (ICS) to respond to all emergencies involving hazards.

In addition to the Facility Emergency Plan, VTA has developed the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following mass notification systems:
  - Public Address Speaker Systems
  - Electronic Mass Notification Communication Systems- including email, phone, and text messaging (Everbridge)
- Established evacuation plans for each workplace location consisting of maps of evacuation routes that indicate emergency exits and routes. Some locations have Emergency Response Team (ERT) members trained to assist, if possible, with site emergencies.
- How to obtain help from management, security personnel, or law enforcement including posting and availability of key contact information throughout the workplace.
- If there is an immediate emergency, transit workers are instructed to call 9-1-1. Instructions of summoning outside agencies (Police/Fire/EMS) are posted in work locations.
- Use of panic buttons or other devices to alert the OCC of an emergency condition.
- Supplemental information as provided in the VTA EOP, PTASP, and related documents.

After initiating a response if needed by emergency law enforcement personnel, any security event consisting of workplace violence should be reported to the following, when it is safe to do so:

<b>Responsible Persons</b>	<b>Job Title/Position</b>	<b>WVPP Responsibility(ies)</b>	<b>Phone #</b>	<b>Email</b>
Aston T. Greene	Chief System Safety & Security Officer	Designated as the WVPP Administrator and is responsible for implementing and maintaining the WVPP.	408-533-5609	Aston.Greene@vta.org
Susan Lucero	Deputy Director of Safety & Compliance	Serve as the liaison between VTA, law enforcement/intelligence agencies, and external regulatory agencies	408-321-5977	susan.lucero@vta.org

### 6.1 Post Workplace Violence Incident Analysis

After a workplace incident, the TAT, including the Chief of System Safety and Security/WVPP administrator or their designee, will use established investigatory processes to complete a post-incident analysis for all reports of workplace violence.

Post Incident Analysis activities include, but are not limited to:

- Visit the security event location related to an incident of workplace violence as soon as safe and practicable.
- Interview involved parties, such as transit workers, witnesses, law enforcement, and/or security personnel.
- Review and analyze Closed-Circuit Television (CCTV) video footage of existing surveillance cameras if available.
- Examine the workplace for workplace violence security risk factors associated with a security event.
- Obtain any reports completed by law enforcement or external agencies.
- The Violent Incident Log (Appendix D) will be used for every workplace violence incident.

Transit worker support and resources, such as counseling services, are provided to affected transit workers.

VTA maintains a contract with Resources for Living and provides access to an Employee Assistance Program (EAP). A brochure is available <https://www.vta.org/sites/default/files/2021-11/EAP%20Brochure.pdf> or the EAP can be contact by telephone at 1-800-962-1306.

### 6.2 Workplace Violence Incident Log

VTA will maintain a Workplace Violence Incident Log (Appendix D). This log must be used for every workplace violence incident that occurs to a transit worker in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the transit worker who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:

- Names
- Addresses – physical and electronic
- Telephone numbers
- Social Security number

A copy of the Workplace Violence Incident Log is maintained in Appendix D. During investigations into workplace violence; VTA will ensure the protection of transit workers' personal identifying information



documented during the investigation process. This includes information that would reveal the identification of any transit workers involved in a violent incident, such as the transit worker's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

### **6.3 Employer Reporting Responsibilities**

As required by the California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, VTA will immediately report to Cal/OSHA any serious injury or illness (as defined by CCR, Title 8, Section 330(h)) or death (including any due to Workplace Violence) of a transit worker occurring in a VTA workplace in the course of a transit workers job duties.

The Chief System Safety & Security Officer or designee shall ensure the reporting of incidents in accordance with the CCR.



## 7.0 Record Keeping

### 7.1 Record Keeping Requirements

In accordance with LC 6401.9, 49 CFR Part 673.31, CPUC GO 143 series, and VTA's Policy and Record Retention Program records related to the WVPP and workplace violence shall be created and maintained as follows:

- Records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Training records for a minimum of one (1) year and include the following:
  - Training dates.
  - Contents or a summary of the training sessions.
  - Names and qualifications of persons conducting the training.
  - Names and job titles of all persons attending the training sessions.
- Violent incident logs for minimum of five (5) years.
- Workplace violence incident investigations for a minimum of five (5) years.

**Note: The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code**

All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

### 7.2 Employee Access to Records

As required by LC 6401.7 and 6401.9, Upon request, VTA shall make available to Transit Workers upon request without cost, for examination and copying within fifteen (15) calendar days of a request, records of security events qualifying as workplace violence, associated workplace violence hazards with mitigations, training records, and Appendix C.

Transit Workers requesting records shall email the Human Resources Employee Relations unit at VTA's Employee Relations Hotline at (408) 321-2397 or email [ERComplaints@vta.org](mailto:ERComplaints@vta.org).

## 8.0 Acronyms & Definitions

### 8.1 Acronyms

The following section covers many of the acronyms utilized in the WVPP.

<b>ACRE</b>	Accessibility, Civil Rights and Equity Department
<b>ADA</b>	Americans with Disabilities Act
<b>AGM/CFO</b>	Assistant General Manager/Chief Financial Officer
<b>ATU</b>	Amalgamated Transit Union
<b>CaIOSHA</b>	California Occupational Safety and Health Administration
<b>CAP</b>	Corrective Action Plan
<b>CBA</b>	Collective Bargaining Agreement
<b>CCR</b>	California Code of Regulation
<b>CCTV</b>	Closed Circuit Television
<b>CFR</b>	Code of Federal Regulations
<b>CPO</b>	Chief People Officer
<b>CPTED</b>	Crime Prevention Through Environmental Design
<b>CPUC</b>	California Public Utilities Commission
<b>EEO</b>	Equal Employment Opportunity
<b>EH&amp;S</b>	Environmental Health & Safety
<b>EOP</b>	Emergency Operations Plan
<b>FTA</b>	Federal Transit Administration
<b>GM/CEO</b>	General Manager/Chief Executive Officer
<b>GO</b>	General Order
<b>HMP</b>	Hazard Management Program
<b>HR</b>	Human Resources
<b>IIPP</b>	Injury and Illness Prevention Program
<b>LC</b>	California Labor Code
<b>MOU</b>	Memorandum Of Understanding
<b>NEO</b>	New Employee Orientation
<b>NTD</b>	National Transit Database
<b>OCC</b>	Operations Control Center
<b>WD&amp;EX</b>	Workforce Development & Employee Experience
<b>OSHA</b>	Occupational Health and Safety Administration
<b>PED</b>	Personal Electronic Device
<b>PPE</b>	Personal Protective Equipment
<b>PTASP</b>	Public Transportation Agency Safety Plan
<b>RTA</b>	Rail Transit Agency (VTA)



<b>SSI</b>	Security Sensitive Information
<b>SSO</b>	State Safety Oversight
<b>SSP</b>	System Security Plan
<b>TAT</b>	Threat Assessment Team
<b>TROP</b>	Temporary Restraining Order Program
<b>TVA</b>	Threat Vulnerability Assessment
<b>VTA</b>	Santa Clara Valley Transportation Authority
<b>WD&amp;EX</b>	Workforce Development & Employee Experience
<b>WP&amp;S</b>	Way, Power, & Signals
<b>WVPP</b>	Workplace Violence Prevention Plan
<b>WVPPRC</b>	WVPP Review Committee

## 8.2 Definitions

The following section covers many of the common terms utilized in the WVPP and defined below.

- **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan (PTASP) of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management (TAM) Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan, in accordance with 49 U.S.C. 5326. The General Manager/Chief Executive Officer (GM/CEO) is Santa Clara Valley Transportation Authority's (VTA's) Accountable Executive.
- **Assault** means a physical assault is one where the assailant makes physical contact with the worker, including bodily contact (including saliva) or by any object, weapon, or projectile to do so. A Non-physical assault include verbal threats, harassment, intimidation, or interference with a worker's duties (This definition subject to change once FTA finalizes 49 CFR 673).
- **Chief Safety Officer** means an adequately trained individual who has responsibility for system safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer.
- **Emergency** Means an unanticipated circumstance that can be life threatening or pose a risk of significant injuries to employees or other persons.
- **Engineering Controls** means an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.
- **FRA** means the Federal Railroad Administration (FRA), an operating administration within the United States Department of Transportation.
- **FTA** means the Federal Transit Administration (FTA), an operating administration within the United States Department of Transportation.
- **Hazard** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.



- **Imminent Danger** is any condition or practice which could reasonably be expected to cause death or serious physical harm immediately or before the hazard can be eliminated.
- **Incident** means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
- **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
- **Learning Management System (LMS)** is a software application for the administration, documentation, tracking, reporting, automation, and delivery of educational courses, training programs, materials or learning and development programs.
- **National Public Transportation Safety Plan (NPTSP)** means the FTA plan to improve the safety of all public transportation systems that receive federal financial assistance under 49 U.S.C. Chapter 53.
- **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- **Operator of a Public Transportation System** means a provider of public transportation as defined under 49 U.S.C. 5302(14).
- **Passenger** means an individual on-board, boarding, or alighting a transit vehicle.
- **Patron** means an individual waiting for or leaving transit stations; on stairs, escalators, or elevators; or in mezzanines, parking lots, or other transit-controlled property
- **Performance Measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- **Performance Target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration.
- **Probability** means the likelihood that hazard consequences might occur, considering the worst foreseeable condition.
- **Public Transportation Agency Safety Plan (PTASP)** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk Mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- **Safety Assurance** means processes within a transit agency's Safety Management System (SMS) that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Hazard** is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

- **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
- **Safety Management System (SMS)** means the formal, top-down, organizational-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- **Safety Management System (SMS) Executive** means a Chief Safety Officer or an equivalent.
- **Safety Performance Target** means a Performance Target related to safety management activities.
- **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
- **Safety Risk Assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Management** means a process within a transit agency's PTASP for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Severity** means the anticipated effects of a consequence, should it materialize, considering the worst credible condition.
- **Serious Injury** means any injury which:
  - Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;
  - Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
  - Causes severe hemorrhages, nerve, muscle, or tendon damage;
  - Involves any internal organ; or
  - Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.
- **Security Breach** means an act that violates VTA security policies, practices, or procedures.
- **Serious injury or illness (SB553)** 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.
- **State of Good Repair** means the condition in which a capital asset is able to operate at a full level of performance.
- **The Hub** means VTA's internal website and document repository.
- **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.
- **Track Zone** means the area within six (6) feet of the closest rail on both sides of the track.
- **Transit Agency** means an operator of a public transportation system.

- **Transit Asset Management (TAM) Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 62.
- **Transit Worker** means any employee, contractor, or volunteer working on behalf of the transit agency.
- **Verification of Transit Training** is a certificate issued by the California Department of Motor Vehicles that verifies bus operators have received the required eight hours of annual training.
- **Violent Incident Log** means the violent incident log required by LC section 6401.9. The Violent Incident Log is maintained as Appendix D of this plan.
- **VTAlerts Mobile Application** is a mobile application which allows VTA's riders to report safety concerns and suspicious activities occurring on light rail, bus and VTA property directly to VTA's Security from an iPhone, Android or iPad. The information provided, using text and photos, helps us to respond quickly to incidents, as they are observed. In the event of an actual emergency, VTA's riders will also have the ability to access 911 by the push of a button. VTAlerts includes a "test" feature that allows riders to try out the app prior to being witness to a real emergency situation.
- **Work Practice Controls** means procedures and rules which are used to effectively reduce workplace violence hazards.
- **Workplace Violence** means any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- 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.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

The following four (4) workplace violence types as defined by CalOSHA are as follows:

- **Type 1 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 2 violence** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.
- **Type 4 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.

Workplace violence does not include lawful acts of self-defense or defense of others.



**Workplace Violence Prevention Plan (WVPP)**

Version 1  
July 1, 2024

- **Workplace Violence Prevention Plan** means the workplace violence prevention plan required by LC section 6401.9.



## **9.0 Appendices**

- 9.1 Appendix A – AS-HR-PL-2600 Violence Free Workplace
- 9.2 Appendix B – *Reserved for Future Use*
- 9.3 Appendix C – Threat Assessment Team (TAT) Procedure
- 9.4 Appendix D – Violent Incident Log
- 9.5 Appendix E – Violent Incident Report Form
- 9.6 Appendix F – Hazard Management Program (HMP) COS-SAF-PR-3002



## **9.1 Appendix A – AS-HR-PL-2600 Violence Free Workplace**

<b>POLICY</b> <b>VIOLENCE FREE WORKPLACE</b>	<b>Document Number:</b>	AS-HR-PL-2600
	<b>Version Number:</b>	02
	<b>Date:</b>	07/01/2024

**1. Purpose:**

To communicate Santa Clara Valley Transportation Authority's (VTA) policy, standards, and expectations regarding violence in the workplace; to promote a violence free workplace, and to provide guidance for identifying and appropriately responding to instances of related unacceptable behavior.

**2. Scope:**

VTA is committed to providing a safe and secure workplace and will not tolerate acts or threats of violence in the workplace. This policy applies to VTA employees while on duty, as well as to non-employees who conduct business with VTA employees or with the public on behalf of VTA while in service to VTA. This policy applies while on VTA property (including vehicles and parking lots), off premises when performing work related activities, and during events sponsored by VTA. Any violation of this policy may lead to criminal prosecution, and/or disciplinary action, up to and including termination.

**3. Responsibilities:**

**3.1. All Employees**

Employees are prohibited from participating in or promoting acts of workplace violence while in service to VTA.

Any employee who believes that they have been subjected to threats or actual workplace violence, or who is aware of such occurrences, has an obligation to report the behavior/actions following the procedure outlined in the Workplace Violence Prevention Plan (WVPP) as soon as possible so that appropriate and timely action may be taken.

**3.2. Supervisors, Managers, and Executives**

Supervisors, managers, and executives are responsible for prevention and correction of violations of this policy in their areas of responsibility and within the organization.

Supervisors, managers, and executives at all levels are responsible for:

- A. Ensuring employees in their areas of responsibility are aware of this policy and the WVPP;
- B. Ensuring employees in their areas of responsibility are provided instruction on job specific workplace security practices to include:
  - 3.2.B.1. Procedures for reporting workplace security hazards;
  - 3.2.B.2. Escape routes;
  - 3.2.B.3. Explanation of this Violence Free Workplace policy;
  - 3.2.B.4. Explanation of the WVPP;
- C. Ensuring employees in their areas of responsibility comply with this policy;



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- D. Immediately addressing any threatening or violent behavior, even if the person engaged in the behavior or conduct is not a subordinate, or even if the supervisor/manager/executive have not received a complaint;
- E. Taking all reports of threats or actual violence seriously and reporting the incident in a timely manner to ensure the safety and security of all employees, customers, and members of the public;
- F. Initiating immediate and corrective action, up to and including termination from employment, when offenses in violation of this policy obligate such;
- G. Maintaining records and follow up actions as to reports of workplace violence; and
- H. Demonstrating organizational concern for worker emotional and physical health, safety, and security, which includes medical and psychological counseling and debriefing for personnel who experience or witness assaults and other violent incidents.

### 3.3. Human Resources Department - Employee Relations Division

The Human Resources Department - Employee Relations Division shall be responsible for conducting, referring, or directing investigations of any initial claims of workplace violence to determine the next appropriate steps, following the WVPP, and Threat Assessment Team (TAT) procedures.

### 3.4. Protective Services Department

The Protective Services Department, in collaboration with the Threat Assessment Team (TAT), shall be responsible for analyzing complaints of workplace violence and developing appropriate responses. The Protective Services Department Manager will brief the appropriate division Chief or designees, regarding potential or actual incidents and any actions taken or planned in response. In exigent circumstances, Protective Services security staff may be responsible for physically intervening or otherwise responding to acts of violence.

### 3.5. Visitors, Vendors, Consultants, and the Public

All visitors, vendors, consultants, and the public must abide by VTA rules, policies, procedures, and guidelines while on VTA property or while conducting, supporting, or utilizing VTA services or business.

### 3.6. General Manager/CEO

The General Manager/CEO or designated representative will ensure that the policy prohibiting workplace threats or actual violence is made known to all VTA employees and that procedures necessary to assure compliance are implemented.



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The General Manager/CEO or designated representative may request the General Counsel to seek a temporary restraining order and an injunction on behalf of any employee(s) who may have suffered unlawful violence or a credible threat of violence from any individual, that can reasonably be construed to be carried out or to have been carried out at VTA, in accordance with California Code of Civil Procedure, section 527.8.

#### **4. Policy:**

Workplace violence or threats of violence creates obstacles to the safe and efficient operation of business and working relationships. It is VTA's policy to promote a safe environment for its employees and prohibit any form of workplace threats, harassment, intimidation, violence and other forms of disruptive behavior. Inappropriate behavior that could lead to workplace violence and undermine a professional working environment is also prohibited and may violate VTA's policy, even if it does not rise to the level of a violation of the law.

This policy prohibits all threatening behavior regardless of whether the intended recipient is another VTA employee, a passenger, or a member of the general public. The associated workplace violence prevention plan outlines behaviors and activities that are strictly prohibited.

VTA will maintain a Workplace Violence Prevention Plan (WVPP) and program that meets the requirements of applicable California code and shall include at a minimum the following information:

- Roles and Responsibilities of Personnel involved in the workplace violence prevention plan, including an identified administrator who has the authority and responsibility for implementing the provisions of the plan.
- Employee Active Involvement requiring the active participation of employees and authorized employee representatives in developing, implementing, and maintaining the plan.
- Employee Compliance requirements ensuring employees comply with the rules and work practices that are contained in the plan and designed to make the workplace more secure. This includes a requirement for employees to avoid engaging in threats or physical actions which create a security hazard for others in the workplace.
- Communication with Employees that is conducted in an open, two-way format between the management team, staff, and other employees and includes workplace violence issues essential to a safe and productive workplace. The communication system shall be designed to facilitate a continuous flow of

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workplace violence prevention information between management and staff in a form that is readily understandable by all employees.

- Coordination with Other Employees through procedures and processes so that the WVPP is implemented in a manner that ensures other employers and employees understand their roles and responsibilities within the VTA plan.
- Workplace Violence Incident Reporting Procedure that identifies to whom and how workplace violence concerns and incidents are reported in a timely manner to a representative of the Agency that ensures appropriate action is taken in accordance with relevant sections of the WVPP. This element also includes the formation and ongoing maintenance of a Threat Assessment Team (TAT).
- Emergency Response Procedures which include specific measures to handle actual or potential workplace violence emergencies. This includes: emergency alerting; sheltering and evacuation plans; and, obtaining assistance from staff and outside agencies.
- Workplace Violence Hazard Identification and Evaluation process established and conducted to ensure that workplace violence hazards are identified and evaluated through periodic inspections, data collection and analysis, and other identified methods.
- Workplace Violence Hazard Correction Process that ensures timely evaluation and correction of hazards.
- Procedures for Post Incident Analysis that ensure a process for effective assessment of information specific to the incident to identify root cause and improvement planning to reduce the risk of recurrence of similar incidents.
- Training and Instruction on the WVPP for all employees, managers, and supervisors on general and job-specific workplace violence practices when the plan is first implemented, on an annual basis, whenever new or previously unrecognized factors are identified, and when changes are made to the plan.
- Employee Access to Written WVPP shall be done so that it is readily available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times.
- Recordkeeping requirements for documents related to the WVPP, including a process for maintaining:
  - Records of workplace violence hazard identification, evaluation, and correction for a minimum of five (5) years;

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- Records of training on workplace violence that include the date(s), contents or summary, names and qualifications of those leading the training, and names and job titles of attendees for a minimum of one (1) year;
- Record of the Violent Incident Logs for a minimum of five (5) years; and,
- Records of workplace violence incident investigations for a minimum of five (5) years. Note: the records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- Employee Access to Records shall follow a process established by the plan that requires a request from the employee or their representative and a response to the request within fifteen (15) calendar days, for examination and copying without cost. Records subject to request include: Records of workplace hazard identification, evaluation, and correction; training records; and violent incident logs.
- Review and Revision of the WVPP for effectiveness shall be at least annually; when a deficiency is observed or becomes apparent; after a workplace violence incident; and, as needed.
- Employer Reporting Responsibilities shall be as required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, VTA will immediately report to Cal/OSHA any serious injury or illness (as defined by CCR, Title 8, Section 330(h)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.
- Maintain A Written “Violent Incident Log” that is in a written format and used for every workplace violence incident that occurs in the workplace. The information recorded will be based on: information provided by employees who experienced the incident of violence; witness statements; and, all other investigation findings. All information that personally identifies individuals involved shall be omitted from the log. The workplace violence log shall include: Location of Incident; Time and Date of Incident; Workplace Violence Type; Details of the incident; Perpetrator; Circumstances at time of incident; Consequences related to the incident; Injuries; Cal/OSHA reporting status (if applicable); Employer Reporting information; and, Identity of person completing form.

#### 4. Definitions:

**Emergency** - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

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**Engineering controls** - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.

**Log** - The violent incident log required by LC section 6401.9.

**Plan** - The workplace violence prevention plan required by LC section 6401.9.

**Retaliation** - Retaliation is an illegal practice of harassing, treating someone differently, or taking an adverse employment action against an employee, because of his/her participation in a protected activity such as filing a complaint or grievance, voicing opposition to discrimination in the workplace, or serving as a witness in a workplace investigation or lawsuit. Retaliation can be any behavior that is likely to deter a reasonable worker from engaging in the protected activity.

Retaliation against any person for exercising their rights or obligations under this policy is expressly prohibited. All employees are encouraged to report violations without fear of retribution.

**Serious injury or illness** - 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 Assessment Team (TAT)** - A multi-disciplinary group of individuals assembled to triage and appropriately respond to reports of workplace incidents in accordance with the WVPP.

**Threat of violence** - 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** - Any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- 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.

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- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:
  - **Type 1 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 2 violence** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
  - **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.
  - **Type 4 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.

**Workplace violence does not include lawful acts of self-defense or defense of others.**

**Work practice controls** - Procedures and rules which are used to effectively reduce workplace violence hazards.

### 5. *Summary of Changes:*

Updated Section 4 – Policy, to incorporate required changes related to SB553 requiring VTA to adopt a Workplace Violence Prevention Plan (WVPP).




Incorporated inclusive pronouns.

Updated Department Name from Human Resources to Human Resources Department - Employee Relations Division

This policy is subject to periodic review.

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6. *Approval Information:*

<i>Prepared by</i>	<i>Reviewed by</i>	<i>Approved by</i>
<p>DocuSigned by:                        Sonya Morrison                      17A9807017EE430...</p>	<p>DocuSigned by:                        Aston Greene                      B09B924DB0F84ED...</p>	<p>DocuSigned by:                        Jaye Bailey                      CAD6B5C0B52549B...                      For General Manager/CEO</p>
<p>Sonya M. Morrison                      Chief People Officer</p>	<p>Aston Greene                      Chief of System Safety and                      Security Officer</p>	<p>Carolyn M. Gonot                      General Manager/CEO</p>

Date Adopted 6/24/2024

### 9.3 Appendix C – Threat Assessment Team (TAT) Procedure

Appendix C to this WVPP contains information from the VTA Threat Assessment Team (TAT) Procedure. The Santa Clara Valley Transportation Authority's (VTA) System Safety and Security Department is responsible for facilitating VTA's Workplace Violence Prevention Plan (WVPP) in accordance with the Bipartisan Infrastructure SB-553 and California Labor Code (LC) LC6401.7 and LC6401.9.

The Threat Assessment Team (TAT) is a multidisciplinary group assembled to provide resources and a defined process to respond to incidents or concerns of workplace violence that are identified and/or reported to VTA, any supervisor, manager, the TAT, Human Resources, Legal or Security. The TAT is designated by VTA to activate as needed for triage and appropriately respond to reports of workplace incidents in accordance with the WVPP and accepted industry practices. The TAT investigates reports and complaints of workplace violence and/or conditions that pose a risk to VTA transit workers, and initiates appropriate mitigation actions, including but not limited to summoning law enforcement, providing intervention, defusing situations, initiating emergency response protocols, engaging third-party professionals, and modifications.

The TAT supports the Agency in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of governance, threat management and control processes.

The TAT works in coordination with the Chief of System Safety and Security in delivering the Workplace Violence Prevention Plan and the program of supporting activities.

4.0 Threat Assessment Team (TAT) Response to Workplace Violence Incident and Condition Reports Procedure:

#### **Step 1: Report is filed/received**

- Report is initiated by an affected employee through any of multiple readily available methods identified in the WVPP.
- Report received by either the employee's direct supervisor or manager who is accountable to receive the report on behalf of the VTA.
- Supervisor or manager initiates immediate actions, including but not limited to summoning law enforcement and providing priority notice to the TAT.

#### **Step 2: Report referred to TAT**

- Report is received and initially assessed by the Intake Evaluation Team within Human Resources Employee Relations or by a TAT member.
- TAT members activated during emergency using mass notification system.
- TAT conducts follow-up using established checklists and flow-charts.
- TAT Implements Emergency Actions (as determined). In any potentially life-threatening situation, the following immediate response procedures should be followed:
- Call 9-1-1 or ensure this has occurred
- Implement any applicable response procedures and plans (Active Shooter Plan, Lock Down Plan, Notification System/Alert Activation, Threat Assessment Team, Incident Management/Support Team, etc.)
- Ensure all internal and external notifications have occurred.
- Ensure responders have access to facilities and detailed information on situation, including applicable updates- safety is paramount.
- Avoid the danger zone by moving to a safer location in the facility or away from the facility itself, as indicated by the situation and local response plan.
- Use available technology to monitor unresolved situations and communicate real-time updates to affected personnel and emergency responders to assist in decision-making.
- Deny an attacker access to additional victims by notifying those within potential danger zones to either escape or seek shelter (per protocols and training). Whenever possible, take action to prevent or restrict a perpetrators movement into other areas or effectively barricade portals to areas where personnel have taken temporary refuge- consider activation of lock down or similar processes and procedures.





- Implement lawful defensive measures.
- Provide first aid for injured persons when safe to do so.
- Comply with requests from responders.
- Account for all personnel and attempt to locate anyone missing or unaccounted for.
- Engage additional resources as needed, including:
  - Law Enforcement
  - Behavioral Specialists
  - Employee Assistance Program
- Develop recommendations for appropriate responses to resolve an incident and assist relevant management or employee representatives with implementation.
- Perform continuous monitoring and follow-up actions as appropriate.

**Step 3: Debriefing/Post Incident Analysis**

Debrief/conduct Post Incident Analysis to evaluate effectiveness of the WVPP and incident management process; identify opportunities for improvement and assign a responsible party to develop and implement corrective action plans.

**Step 4: Document/Recordkeeping**

Track incident using Violent Incident Log as identified in the WVPP.

TAT Response to Non-Emergency Situations

TAT Implements Non-Emergency Actions (as determined). If reported situation does not present an immediate threat to physical safety and well-being of others, the following actions are taken to manage the incident:

**Step 1: Consider Activation of the Threat Assessment Team (TAT) using notification system****Step 2: Conduct an initial gathering of information using the Violent Risk Screening Process or Threat Assessment Template****Step 3: Perform a preliminary violence risk screening based on known information- this must be repeated as new information is obtained/developed****Step 4: Develop a plan for early actions based on the initial screening****Step 5: Conduct a deeper, continued investigation and re-evaluate risk as new information is received or developed****Step 6: Based on initial information and risk assessment, determine the urgency presented by the situation, including the following potential options:**

- If concern is unwarranted/unsubstantiated (Low Risk) manage situation with human resources (if employee) within established processes/policies/labor agreements
- If some concern for violence, but not significant or urgent (Medium Risk), continue with information gathering process
- If there is a concern for violence and/or emergency risk (High Risk), consult with a third party (behavioral specialist and/or law enforcement) for assistance
- Note: when in doubt, consider law enforcement and/or behavioral specialist intervention
- Implement any additional incident management actions, such as formal violence risk assessments and other needed intervention.
- Engage outside resources as needed, including:
  - Law Enforcement
  - Behavioral Specialists
  - Employee Assistance Program
- Develop recommendations for appropriate responses to resolve an incident and assist relevant management or employee representatives with implementation.





- Perform continuous monitoring and follow-up actions as appropriate.

**Step 7: Debriefing/Post Incident Analysis**

Debrief/conduct Post Incident Analysis to evaluate effectiveness of the WVPP and incident management process; identify opportunities for improvement and assign a responsible party to develop and implement corrective action plans.

**Step 8: Document/Recordkeeping**

Track incident using Violent Incident Log as identified in the WVPP.

**TAT investigation either completed or referred to law enforcement**

**Step 1:** Notification to law enforcement based on threat assessment

**Step 2:** Decision to implement ongoing monitoring or close investigation

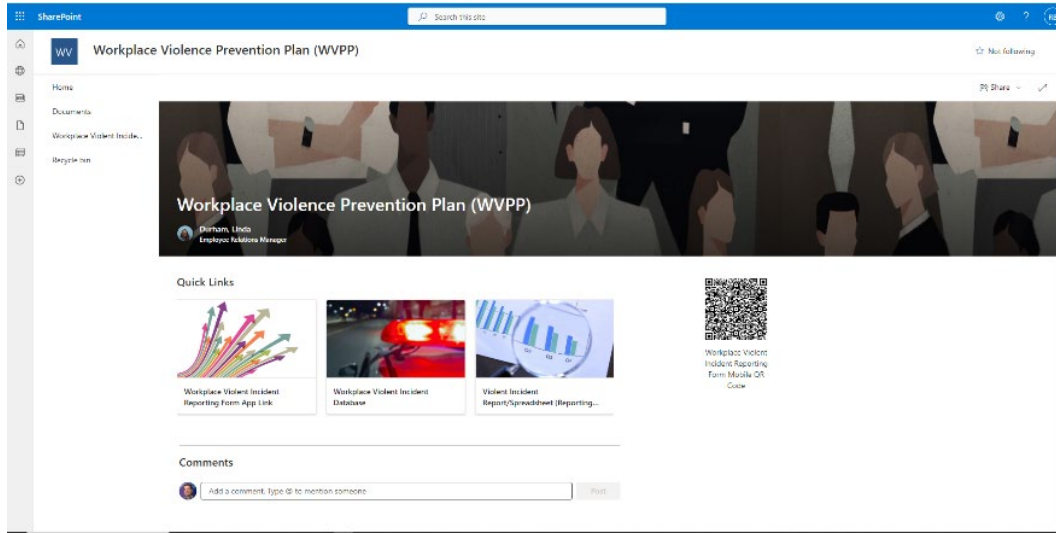
**Step 3:** TAT returns closes reporting loop

**Step 4:** Follow-up with reporting party and provide update

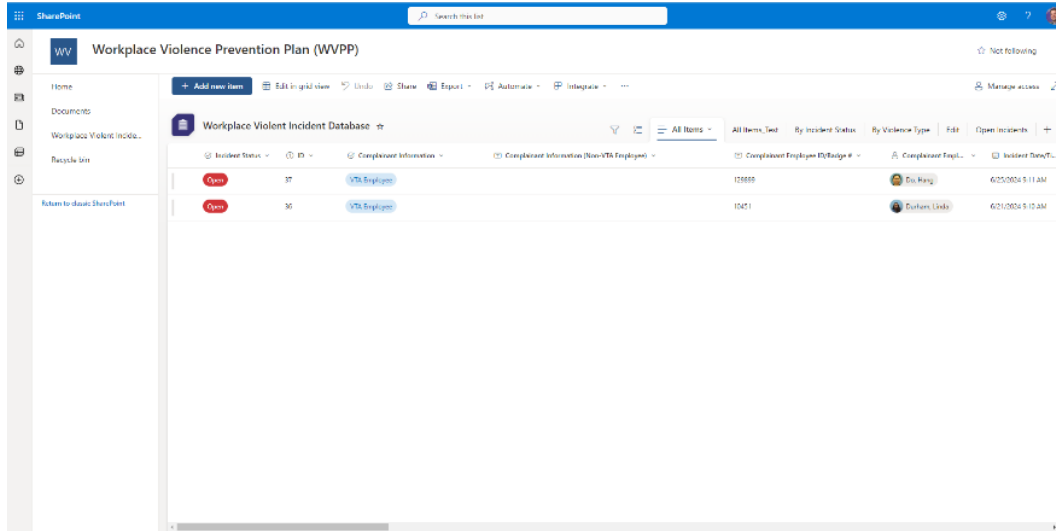
**Step 5:** TAT documents event on Violent Incident Log

**Step 6:** Document report in Violent Incident Log

**9.4 Appendix D – Violent Incident Log**

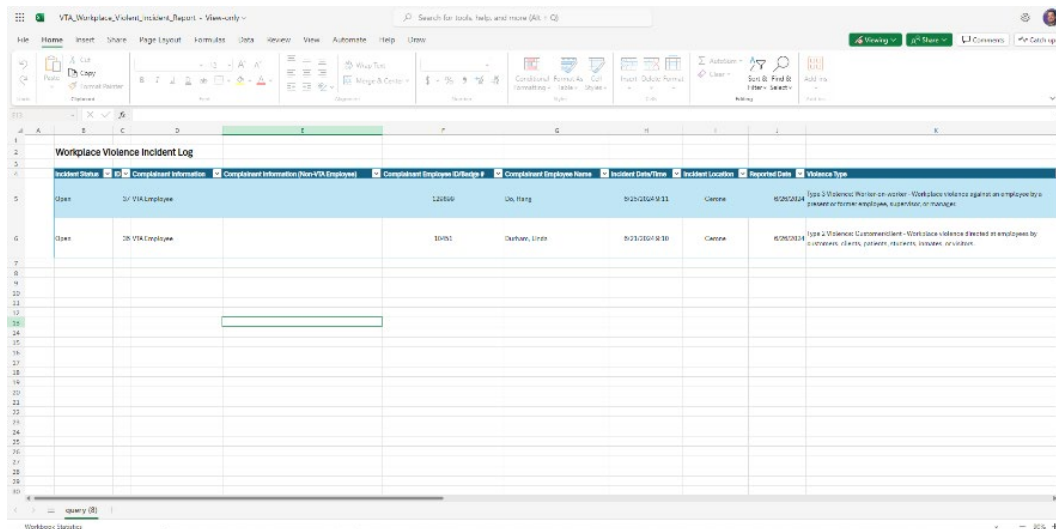


The screenshot shows the SharePoint home page for the Workplace Violence Prevention Plan (WVPP). It features a navigation pane on the left with options for Home, Documents, Workplace Violent Incidents, and Reporting. The main content area includes a header with the title 'Workplace Violence Prevention Plan (WVPP)' and a 'Quick Links' section with three tiles: 'Workplace Violent Incident Reporting Form App Link', 'Workplace Violent Incident Database', and 'Violent Incident Report/Open/submit [Reporting...]'.



The screenshot displays the 'Workplace Violent Incident Database' list view in SharePoint. The table contains two incident records:

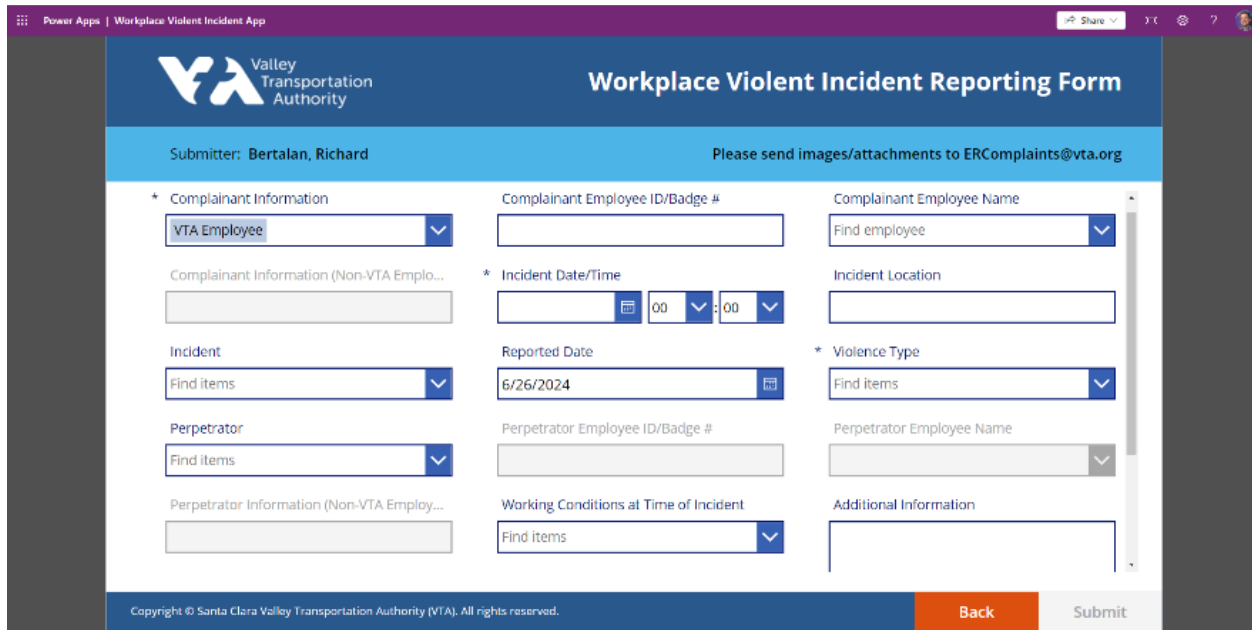
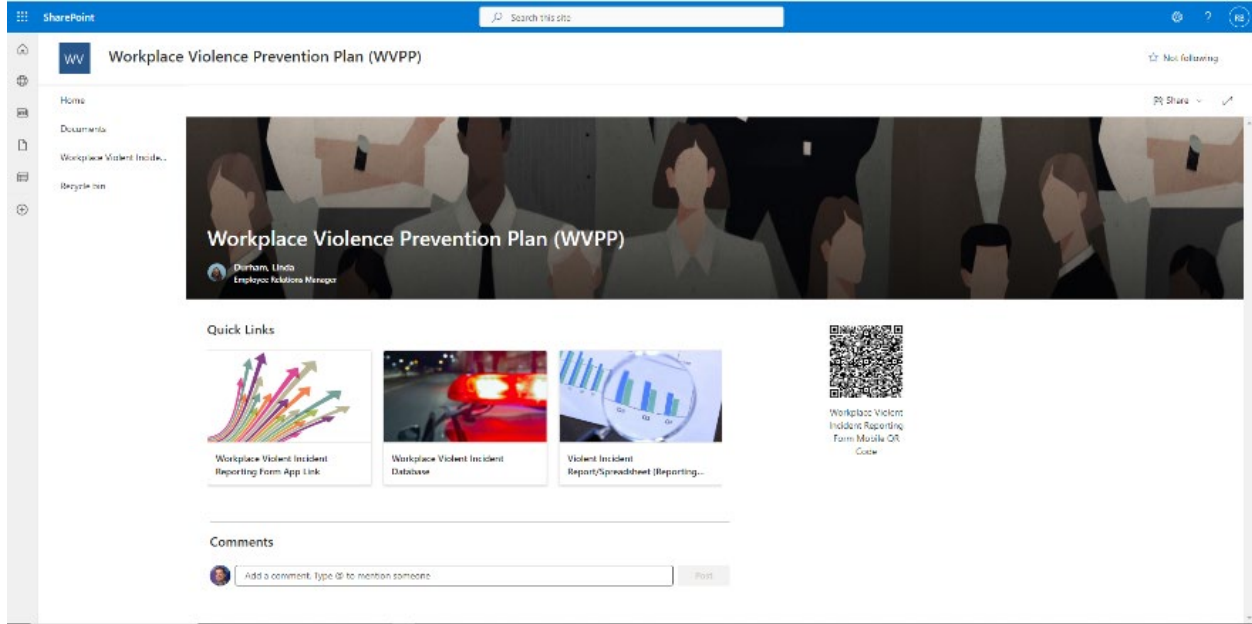
Incident Status	ID	Complainant Information	Complainant Information (Non-VTA Employee)	Complainant Employee ID/Range #	Complainant Empl...	Incident Date/T...
Open	37	VTA Employee		12655	Lin Wang	6/25/2024 5:11 AM
Open	36	VTA Employee		10451	Durham, Linda	6/21/2024 5:10 AM



The screenshot shows an Excel spreadsheet titled 'Workplace Violence Incident Log'. The spreadsheet contains the following data:

Incident Status	Complainant Information	Complainant Information (Non-VTA Employee)	Complainant Employee ID/Range #	Complainant Employee Name	Incident Date/Time	Incident Location	Reported Date	Violence Type
Open	37	VTA Employee	12656	Lin Wang	6/25/2024 5:11	Genoa	6/25/2024	Type 3 Violence: Partner or ex-partner - Workplace violence against an employee by a partner or former employee, supervisor or manager
Open	36	VTA Employee	10451	Durham, Linda	6/21/2024 5:10	Genoa	6/26/2024	Type 4 Violence: Complainant - Victim (includes violence directed at employees by customers, clients, patients, residents, visitors, or visitors)

### 9.5 Appendix E – Violent Incident Report Form





**9.6 Appendix F – Hazard Management Program (HMP) COS-SAF-PR-3002**

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### 1. Purpose:

The purpose of the Hazard Management Program (HMP) is hazard identification, reporting, assessment, mitigation, and follow-up. The program allows all employees and contractors methods to communicate recognized workplace hazardous conditions, unsafe acts/practices, and/or close call incidents to management without fear of reprisal. It provides a structured management approach for: the identification of hazards, risk level assessments, determination of department(s) accountability, corrective actions development and monitoring, along with a tracking system for corrective action status, and the processes needed to ensure action is taken to eliminate, mitigate or manage the hazard as low as reasonably practicable (ALARP).

### 2. Scope:

This procedure with all associated guidelines and forms, applies to all Santa Clara Valley Transportation Authority (VTA) employees, and contractors doing work on behalf of VTA. This procedure also addressed reports of hazards made from other government agencies as well as from members of the public. Although this procedure is heavily weighted toward identifying, assessing, eliminating, mitigating and managing risks in the maintenance and operation of bus and rail transportation, the concepts and processes apply to all VTA departments.

Note: light rail vehicle related near-miss incidents are reported directly to the Operations Control Center (OCC) or as described in the Roadway Worker Protection (RWP) manual. The incidents are entered and tracked through a web based system, reviewed by the Active Right of Way Committee and reported monthly to the Rail System Safety Review Board (RSSRB). In the event that hazardous trends are discovered requiring mitigation, the identified hazard will be treated as any other hazard as applicable to this program.

### 3. Responsibilities:

3.1. The General Manager is responsible for:

3.1.1. Cultivating and promoting an Agency-wide Safety Culture.

3.1.2. Setting safety goals, safety performance objectives and reporting to the Board of Directors on safety activities of the agency.

3.1.3. Giving safety, security, and hazard management due consideration through all decision making processes including the control and direction over human and capital resources.

3.1.4. Ensuring the overall quality and safety of VTA programs.



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3.2. The Executive Staff is responsible for:

- 3.2.1. Consulting with the Safety and Compliance Department on the mitigation of reported safety hazards and unsafe conditions.
- 3.2.2. Evaluating and approving the hazard analysis and mitigation measures and accepting or rejecting the residual risk level.
- 3.2.3. Actively promoting safety and safe work practices in policies and other verbal and written communications.

3.3. Department Heads/Superintendents/Managers are responsible for:

- 3.3.1. Ensuring all staff and contractors under their supervision are trained in hazard reporting and the Hazard Management Program.
- 3.3.2. Establishing and maintaining safety performance by ensuring adherence to all established safety rules and procedures. Reporting new and repeat safety rule violations and unsafe behavior or work practices to the Safety and Compliance Department along with corrective action plans and timelines.
- 3.3.3. Conducting hazard analysis on reported hazard and unsafe conditions by consulting with the Safety & Compliance Department and other stakeholder departments including tracking mitigation measures, and follow-ups.
- 3.3.4. Performing and providing hazard analysis as required by the applicable configuration management procedure in accordance with the agency wide configuration management Standard Operation Policy (SOP).
- 3.3.5. Performing and providing hazard analysis results to the Safety and Compliance Department as required by the applicable configuration management procedure in accordance with the agency wide configuration management standard operation policy in connection with; new construction and system modification projects, safety certifications, procurement processes, and service change bulletins.
- 3.3.6. Review corrective actions recommended by the Supervisor to determine if corrective action(s) has been completed.

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3.4 All Supervisors and all Project Managers are responsible for:

- 3.4.1 Ensuring all staff and contractors under their supervision are trained in hazard reporting and the Hazard Management Program.
- 3.4.2 Notifying the Safety and Compliance Department of any reported possible hazardous exposure as consistent with the VTA Hazard Management Program.
- 3.4.3 Notifying their department head and the Safety and Compliance Department of any employee injury resulting from unsafe behavior, work practice or process, along with any unsafe or hazardous condition on VTA property, equipment or facility.
- 3.4.4 Ensuring hazards, including those identified through facility inspections, are assigned a corrective action plan with schedule of implementation, responsible staff member(s), and communication to their department head and to the Safety and Compliance Department either as described in section 4.1 or by entry into the Electronic Hazard Reporting and Tracking System (EHRTS).
- 3.4.5 Assessing, documenting, and correcting reported hazards within a timely manner. Communicate advisories to all employees who have the potential of exposure to an unsafe condition as soon as practicable before mitigation measures have been completed.
- 3.4.6 Ensuring implementation of mitigation measures developed through the hazard analysis. Report any delays in implementing the mitigation measures to their department heads and the Safety & Compliance Department.
- 3.4.7 The follow-up and resolution of all reported hazards/risks applicable to their departments and providing status updates through either the EHRTS or directly to the Safety and Compliance Department.
- 3.4.8 All hazards not capable of resolution by the Supervisor will be communicated to the department head, superintendent or manager, and the Safety and Compliance Department.
- 3.4.9 Providing feedback to the reporting staff member affected by the hazard/risks.



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3.5. All Employees and Contractors are responsible for:

3.5.1 Reporting all hazards identified as soon as possible to their immediate Supervisor via any of the reporting methods listed in 4.1.2. A copy of all forms submitted, and all hazards identified will be reported to the Safety & Compliance Department either by email communication or forwarding the forms received

3.5.2 All employees and contractors are responsible for following the procedures outlined in this Hazard Management Program upon receiving initial training on the VTA procedures.

3.6 The Safety & Compliance Department is responsible for:

3.6.1 Developing and implementing the Hazards Management Program.

3.6.2 Overseeing and/or documenting, investigating, following-up, and tracking hazards reported by VTA employees and contractors, as well as any reports from outside the agency by other government agencies and members of the public.

3.6.3 Overseeing and/or performing hazard trend analysis on reports such as, but not limited to, close call, near miss incidents including RWP violations, loss control, accidents/incidents, hazards, and inspections.

3.6.4 Overseeing and/or determining the final risk rating of all reported hazards by utilizing the Hazard Classification Matrix.

3.6.5 Notifying the California Public Utilities Commission (CPUC) via Form-R for rail related unsafe conditions or hazards in the event that a finalized risk rating is identified as "High".

3.6.6 Reviewing accident/incident reports for any unsafe conditions or acts that may warrant a corrective action plan resulting from an identified hazard.

3.6.7 Providing support for VTA's various training departments for any added insight into safety topics and instruction.

3.6.8 Providing oversight and support of VTA's Hazardous Material Management Program and environmental compliance requirements.

3.6.9 Managing VTA's internal safety auditing program and identifying any hazards requiring a corrective action plan.



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- 3.6.10 Conducting environmental compliance inspections as required and the identification of any unsafe conditions that would constitute a corrective action.
- 3.6.11 Participating, when applicable, in the review of pre-existing modifications and new construction project plans, design development and safety certification processes. Ensuring Preliminary Hazard Analyses (PHA) are performed to mitigate hazards to an acceptable level and are in compliance with all regulatory standards and best industry practices.
- 3.6.12 Performing document reviews of new or changed procurements, new construction projects, system modification projects, and the permit applications, including but not limited to, construction and light rail Right-of-Way (ROW) access, contractor's IPPs, Site Specific Safety Plans (SSSP) and chemical Safety Data Sheets (SDSs) to ensure safety and rules/regulatory compliance.
- 3.6.13 Maintaining hazard tracking from the initial identification through the mitigation or resolution of the hazard. This includes the use of corrective action plans as well as assigned accountable staff for mitigation of the hazard.
- 3.6.14 Serving as a Liaison between VTA and external safety regulatory agencies and ensuring compliance with applicable local, state, and federal regulations.
- 3.6.15 Generating hazard reports from EHRTS for Safety Committees and at the request of Management.
- 3.6.16 At the River Oaks Campus, entering and maintaining hazard reporting information in the EHRTS for all reported hazards via Hazard and Close Call Report form.
- 3.6.17 Monitoring Progress and offering technical assistance for all hazards not resolved in a timely manner.
- 3.6.18 Responding to all received appeals as referenced in COS-SAF-FR-3002 section 4.5.

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3.7 The Enterprise Risk Management Department is responsible for:

- 3.7.1 Notifying the Safety and Compliance Department of any employee injury resulting from a hazardous or unsafe condition on VTA property, equipment or facility.
- 3.7.2 Performing industrial injury or illness trend analysis, identification of corresponding hazardous conditions and reporting through the established hazard reporting mechanisms listed in section 4.1 or directly entering the hazard into the EHRTS.

#### **4 Procedure:**

##### **4.1 Hazard Tracking and Reporting**

- 4.1.1 All hazards must be entered in the EHRTS to document identified hazards. Internal and external reporting methods can be used to initially report the hazard.
- 4.1.2 All employees and contractors may utilize any of the following methods to report a hazard:
  - 4.1.2.1 Complete the Safety/Hazard and Close Call Report Form and follow the written instructions on this form to properly complete a written hazard report.
  - 4.1.2.2 Submit Operator Comment Cards or Inspection/Defect Report Forms.
  - 4.1.2.3 Notify OCC Bus Dispatch at (408) 546-7667 or OCC Rail Dispatch at (408) 546-7688.
  - 4.1.2.4 Provide verbal or email notification to their direct supervision or Union Steward.
  - 4.1.2.5 Provide verbal or email notification to the Safety & Compliance Department at (408) 321-5999 or ReportAHazard@vta.org.
  - 4.1.2.6 Report unsafe or hazardous conditions identified in Configuration Management Procedures or directly in-line with configuration processes or management functions.
- 4.1.3 Non-Employees/Contractors may utilize the following methods for hazard reporting:



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- 4.1.3.1 Directly notify a VTA employee.
- 4.1.3.2 Provide notification to the Customer Service Center (408) 321-2300 or [Customer.Service@vta.org](mailto:Customer.Service@vta.org).
- 4.1.4 Upon receipt of a hazard report, the details will be entered into the EHRTS.
- 4.1.5 A unique identification number will automatically be assigned electronically when entered into the EHRTS to allow for tracking individual hazard reports.
- 4.1.6 Once a hazard is entered into the EHRTS, the online report will have the ability to generate and link a corrective action once the action has been identified by the investigating party.
- 4.1.7 The EHRTS corrective action form will identify the following information relating to the hazard: problem/deficiencies, recommendations, responsible parties, required and actual completion dates, status, and corrective action taken.
- 4.1.8 Responsible parties will receive notification via e-mail from the EHRTS when they are assigned to a corrective action, of an approaching deadline, when deadlines are past due, and when the corrective action has been completed.
- 4.1.9 The VTA Safety and Compliance Department will follow Section 3.6 to ensure hazards(s) are being entered into the EHRTS and tracked through to completion.
- 4.1.10 A Safety and Compliance Department designee will create a hazards report identifying open corrective actions as needed.
- 4.1.11 A status report of rail related hazards will be provided at monthly RSSRB meetings to ensure required staff are working together to eliminate and mitigate hazard(s) to the lowest practical level.
- 4.1.12 The Safety and Compliance Department will provide the final approval of tracked hazard(s); risk assessment rating identified in Section 4.2 and hazard resolutions identified in Section 4.3.
- 4.1.13 The appropriate individual receiving a report will discuss the hazard with the reporting employee, then document this into the EHRTS.

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4.1.14 Hazard Risk Assessment will be performed as set forth by the VTA System Safety Program Plan (SSPP), which utilizes the Safety Management System (SMS) approach to Safety Risk Management (SRM) Appendix C, and the MIL-STD-882E Safety Risk Assessment Matrix Appendix D.

## 4.2 Hazard Investigation

4.2.1 After initial documentation into EHRTS, the responsible party will perform an investigation of the reported hazard and provide feedback to the reporting employee. The investigation will include documentation in both written and visual formats. All documents and photographs associated with the hazard will also be documented in the EHRTS.

4.2.2 During the course of investigation, the responsible party may utilize the following investigatory methods:

4.2.2.1 Contact the reporting party to gather all potential information about the reported hazard.

4.2.2.2 Conduct a walkthrough of the affected area and location, assess the possible hazardous condition, and generate visual documentation (photographs, video) as well as taking any measurements deemed necessary at the location.

4.2.2.3 Conduct interviews with employees in the area to gather relevant information on the reported hazard.

4.2.2.4 Review any documentation associated to the hazard (records, reports, procedures, inspections, technical documents, etc.)

4.2.2.5 Contact other departments which may have association or technical insight into the reported hazard.

4.2.2.6 Review any past reported hazards similar in nature with the support of Safety & Compliance Department.

4.2.2.7 Evaluate work and/or task processes connected to the reported hazard.

4.2.2.8 The methods of investigation are not limited to the listed procedure. The Safety & Compliance Department can provide assistance in pursuing further investigation.



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4.2.3 During the course of investigation, all documentation will be entered into the EHRTS.

4.2.4 When requested, person(s) who provide(s) information regarding safety hazards and/or violations will remain anonymous, and will be protected by the extent permissible by law.

4.2.5 If the initial corrective action is changed or the matter is still not resolved, the Supervisor/Manager will evaluate and resolve the identified hazard, and provide immediate feedback to the reporting employee and/or to employees affected.

#### 4.3 Hazard Resolution and Corrective Action Plan

4.3.1 Hazard Resolution will be performed as determined by the corrective action plan established to mitigate the identified hazard. A resolution may have any of the three outcomes as listed below:

4.3.1.1 Resolved – The hazard was eliminated and no further action is required

4.3.1.2 Not Resolved – The hazard was not eliminated. Further action is necessary to mitigate the identified risk to acceptable levels.

4.3.1.3 Monitoring – The hazard was not eliminated but has been mitigated to a level of acceptable risk. Monitoring shall continue to ensure the risk level is maintained at a continued acceptable level.

4.3.2 After investigation, a copy of the completed form will be forwarded by the Supervisor to Superintendent/Department Manager for review and/or further action as necessary. The completed form will be documented in the EHRTS as well. Project Managers will process all hazards reported by contractors under their direct supervision in the same manner as if the report had been filed by a VTA employee.

4.3.3 The Division Superintendent or Department Manager reviews the corrective action taken by the Supervisor as noted in Part 3 of the Hazard and Close Call Report Form to ensure the action taken by the first level Supervisor is adequate to completely resolve the reported hazard and that the appropriate resources are made available. Complete review within three days of date actions were taken.

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- 4.3.4 If there is no additional action to be taken, or the matter is satisfactorily resolved, retain the original Hazard and Close Call Report form and ensure the report has been entered into the EHRTS.
- 4.3.5 Contact the Safety & Compliance Department to discuss further investigation and appropriate corrective action plans if the hazard is not resolved or mitigated.
- 4.3.6 When addressing the Operator's Inspection/Defect Report Form for Vehicle Defects, the responsible Supervisor/ Foreperson/ Dispatcher shall:
  - 4.3.6.1 See prompt action is taken to resolve the hazard at the most appropriate and practical level possible. If a vehicle defect is not resolved from initial action, the vehicle should be removed from service until the hazard can be mitigated or eliminated.
  - 4.3.6.2 Employee's reporting vehicle defect may also submit a Safety/Hazard and Close Call Report Form to their immediate Supervisor, Superintendent, Manager, or the Safety & Compliance Department.

4.3 Hazard Tracking

- 4.3.1 Upon receipt of a hazard report, the details will be entered into the EHRTS.
- 4.3.2 A unique identification number will automatically be assigned electronically when entered into the EHRTS to allow for tracking individual hazard reports.
- 4.3.3 Corrective actions will be automatically linked to individual hazards for tracking when generated in the EHRTS.
- 4.3.4 The EHRTS corrective action form will identify the following information relating to the hazard: problem/deficiencies, recommendations, responsible parties, required and actual completion dates, status, and corrective action taken.
- 4.3.5 Responsible parties will receive notification via e-mail from the EHRTS when assigned to a corrective action, of an approaching deadline, past due, and the completion of corrective action.



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4.3.6 The VTA Safety and Compliance Department will follow Section 3.6 and provide oversight of departments in order to verify hazard(s) are being entered into EHRTS for proper tracking.

4.3.7 A Safety and Compliance Department designee will create a hazards report identifying open corrective actions.

4.3.8 A status report will be provided to the RSSRB to ensure required staff are working together to eliminate and mitigate hazard(s) to the lowest practical level.

4.3.9 The Safety and Compliance Department will provide the final approval of tracked hazard(s); risk assessment rating identified in Section 4.2 and hazard resolutions identified in Section 4.3.

#### 4.4 Appeals

4.4.1 If any party in the hazard reporting and resolution process is not satisfied with the resolution, the resolution may be appealed in writing to the Director of Safety & Compliance, who shall investigate and communicate in writing their findings to the Union Safety Steward and party filing the appeal within in ten (10) business days.

4.4.2 In the event the decision is not satisfactory to the appellant, the matter may be referred to the appropriate Safety Committee for review and recommended disposition at its next scheduled meeting.

4.4.3 In the event the resolution is not satisfactory to any party after Safety Committee review, the matter may be referred to Executive Management though the Director of Safety and Compliance.

#### 5. Discipline:

VTA's Policies for reporting hazards in the workplace allow all employees to report hazards without fear of reprisal and protects their identity if they wish to remain *anonymous*, and will be protected by the extent permissible by law. These policies also provide a system of communicating with the person(s) concerned. Employees may discuss any safety hazard with their Supervisor or the Safety and Compliance Department for clarification and use of the Hazard and Close Call Report Form.

In cases of self-reporting connected to incidents or accidents resulting from safety rules or procedures violations, lenience may be considered in regard to disciplinary action. However, this policy shall not apply to information received from an anonymous source other than the employee involved, or which involves illegal acts or willful and deliberate

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disregard of established rules, procedures, policies, and regulations. Whistleblowers shall be protected from any form of retaliation, consistent with State and Federal guidelines and regulations.

#### 6. *Definitions:*

Accident – an event that involves any of the following: a loss of life; a report of serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

ALARP – As low as reasonably practicable

Close Call – A narrowly avoided dangerous or hazardous occurrence that *could have* caused death, injury or property damage. (Not to be confused with a *Near Miss*, see below.)

Corrective Action Plan – A plan that describes the actions that the agency will take to minimize, control, correct, or eliminate risks and hazards. This includes a schedule for completion of those actions.

EHRTS – Electronic Hazard Reporting and Tracking System (currently using IndustrySafe)

Form R – Electronic Reporting form utilized by a Rail Transit Agency to make notification to the California Public Utilities Commissions of various conditions and events on a rail transit system.

Hazard – Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of public transportation system; or damage to the environment.

Hazard Classification Matrix – This is a reference to the Department of Defense's MIL-STD-882E-Appendix D

Incident – An event or occurrence that does not necessarily result in death, injury or property damage.

Investigation – The process of determining the casual and contributing factors of an accident, incident, or hazard for the purpose of reoccurrence and mitigating the risk.

Near Miss - A narrowly avoided dangerous or hazardous occurrence that *could have* caused death, injury or property damage *specifically connected to a light rail vehicle*.

PHA – Preliminary Hazard Analysis.



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**Risk** – The assessed likelihood, severity, and frequency or undesirable consequences resulting from a hazard.

**Safety** – The state in which the risk of injury to persons or damage to property is reduced to, and maintained, at or below an acceptable level through a continued process of hazard identification and risk management.

**Safety Hazard** – A safety hazard is a situation or condition that can lead to unintentional danger.

**Security Hazard** – A security hazard is a situation or condition that can lead to intentional danger.

**System** – A composite of personnel, procedures, materials, tools, equipment, facilities, and software, at any level of complexity. The elements of this entity are used together in the intended operational or support environment to perform a given task or achieve a specific production, support, or mission requirement.

**System Safety** – The application of management and engineering principles, criteria, and techniques to the safety aspects of a system within the constraints of operational effectiveness, time, and cost throughout all phases of the system, life cycle.

**VTALERTS** – A mobile phone app for calling 911 and reporting security concerns instantaneously to the VTA Protective Services Department.

**VTA Manager** – Management staff including, but not limited to, the following positions: General Manager, Chief, Director, Deputy Director, Safety Manager, Manager, Operations Manager, Project Manager, Superintendent, Assistant Superintendent and Supervisor

## **7. Records:**

7.1. All documents shall be retained according to the VTA Records Retention Schedule.

7.2. All documents associated to a hazard shall be kept electronically in the EHRTS.

## **8. Appendices:**

8.1. COS-SAF-FR-3002A Safety/Hazard and Close Call Report Form

8.2. COS-SAF-FR-3002B SMS Principles for Transit-Safety Risk Management

8.3. COS-SAF-FR-3002C Safety Risk Matrix

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**9. References:**

- 9.1 49 CFR 659.31 – Hazard Management Process
- 9.2 Department of Defense MIL-STD-882E (Risk Assessment Matrix)
- 9.3 Title 8 California Code of Regulations
- 9.4 Santa Clara Valley Transportation Authority Coach & Rail Operators Rulebooks
- 9.5 49 CFR 673 – Public Transportation Agency Safety Plan
- 9.6 VTA Light Rail System Safety Program Plan version 16

**10. Training Requirements:**

- 10.1. Safety and Compliance Department will provide an initial new hire training overview of the procedures listed in this SOP during new hire orientation.
- 10.2. Safety and Compliance Department will provide “train the trainer” training for each department designee on the procedures listed in this SOP.
- 10.3. Department heads are required to assign a designee to attend the “train the trainer” training
- 10.4. Department designee will provide training to their department staff on the procedures listed in this SOP

**11. Communications Plan:**

Safety & Compliance Department will ensure that continued awareness on this SOP will be incorporated into Tailgate safety briefs normally circulated through the different yards. These briefs along with additional outreach such as printed materials, electronic communications, social media, or verbal communication may be created and distributed on a regular basis on a periodic basis.



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### 12. Summary of Changes:

The entire document has been heavily edited from v.3 to v.4. for both formatting and content compared to the previous version. This version also contains feedback from the unions affected by the program. The guidelines and forms outlined in this procedure have been developed through a joint Union and Management effort and apply to all Santa Clara Valley Transportation Authority (VTA) employees and contractors doing work on behalf of VTA. The Program has been merged with the Injury Illness Prevention Plan (IIPP) creating one single unified plan that address hazards agency wide from bus to rail.

Section 4.1.2.2- Deleted section reference and Section 4.1.2.5- Email changed from [VTA.System.Safety@vta.org](mailto:VTA.System.Safety@vta.org) to [ReportAHazard@vta.org](mailto:ReportAHazard@vta.org). This document supersedes COS-SAF-3002 v.4.

### 12. Approval Information:

<i>Prepared by</i>	<i>Reviewed by</i>	<i>Approved by</i>
 The Safety & Compliance Department	 Angelique M. Gaeta Interim Director, Safety & Compliance Department	 Nuria I. Fernández General Manager/CEO

Date Approved: 10/3/18



**SAFETY / HAZARD AND CLOSE CALL REPORTING FORM**

COS-SAF-FR-3002A

**INSTRUCTIONS:**

This form may be used by all employees to report workplace safety, health and environmental concerns and close call incidents to management. (NOTE: For Light Rail near-miss occurrence, provide verbal report to OCC at 408-546-7688). For additional information, please refer to the Hazard Management Program COS-SAF-PR-3002.

***If hazard presents a clear and immediate danger to health and life, report the problem to your supervisor and if necessary, to the Safety & Compliance Department at (408) 321-5999.***

**Part 1: ORIGINATOR or STEWARD:** Print all information legibly.

Discuss any safety hazard with your Supervisor for clarification before using this form.

Complete Part 1. Make a copy and submit **Original** to your immediate Supervisor/Foreperson/Dispatcher to acknowledge receipt by signature in Part 1.

If the reporting employee does not receive a response/feedback from the Supervisor or Manager within two (2) business days, please send a copy of the completed form to Safety and Compliance. Originator may request copies of the form and current status of any corrective action from the appropriate Superintendent/Manager/Supervisor.

**Part 2: RESPONSIBLE SUPERVISOR/FOREPERSON/DISPATCHER TAKING ACTION**

Complete Part 2 within (2) business days. Indicate immediate or temporary action taken to prevent further injury or damage or indicate "no action taken" and why. Supervisor will enter and upload Safety / Hazard and Close Call Report Forms in VTA's Electronic Hazard Reporting and Tracking System (EHRTS) if access available or email copy to Safety and Compliance at: [ReportAHazard@VTA.org](mailto:ReportAHazard@VTA.org)

- o Make a **Copy** and give to Originator
- o Make a copy for the applicable Safety Steward or Safety Committee Member
- o Give **Original** to Superintendent/Department Manager for completion of Part 3

**Part 3: SUPERINTENDENT/DEPARTMENT MANAGER**

Complete Part 3 within (3) business days of receipt. Distribute as follows if the **corrective action** is **changed** or the matter is still **not resolved**:

- o Make a revised copy for the applicable Originator/Safety Steward or Safety Committee Member
- o Upload copy in IndustrySafe if available or Email to: [ReportAHazard@VTA.org](mailto:ReportAHazard@VTA.org)

**Part 4: SAFETY & COMPLIANCE DEPARTMENT**

Enter receipt date and time. Contact Superintendent/Manager if hazard "not resolved" and treat as an automatic appeal. Assist Department in resolving per regulatory requirements and/or follow appeal procedure. Agendize for next Joint Safety Committee meeting as follows: (a) for review if hazard was resolved: (b) for discussion if issue was appealed.

**Part 5: JOINT SAFETY COMMITTEE**

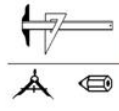
Review appeal letter and recommended corrective action, accept corrective action, or reject and recommend alternative corrective action. Agree to close without resolution or draft written appeal to the Division Director requesting a resolution.

**APPEALS**

- \* If any party in the hazard reporting and resolution process is not satisfied with the resolution, the matter may be appealed in writing to Safety & Compliance Department.
- \* Within ten business days Safety & Compliance will investigate and communicate its findings to the Union Safety Steward and party filing the appeal.
- \* In the event that the decision is not satisfactory, the matter may be referred to the appropriate Joint Safety Committee for review and a recommended disposition at its next scheduled meeting.
- \* If after review by the Joint Safety Committee the resolution is not satisfactory to any party, the matter may be referred to the appropriate Division Director.

**SAFETY / HAZARD AND CLOSE CALL REPORTING FORM**

**COS-SAF-FR-3002A**



**1: ORIGINATOR or STEWARD**

Time: \_\_\_\_\_ Date: \_\_\_\_\_

Reported By (Name): \_\_\_\_\_ Badge#: \_\_\_\_\_

Dept/Div: \_\_\_\_\_ Bldg: \_\_\_\_\_ Vehicle: \_\_\_\_\_

Location of Hazard, Unsafe Condition / Work Practice, or Close Call: \_\_\_\_\_

Description of Hazard, Unsafe Condition / Work Practice, or Close Call: \_\_\_\_\_

Suggestion For Resolving Hazard: \_\_\_\_\_

Received By (Name): \_\_\_\_\_ Date: \_\_\_\_\_ Phone: \_\_\_\_\_

(Immediate Supervisor/Foreperson/Dispatcher)

**2: RESPONSIBLE SUPERVISOR/FOREPERSON/DISPATCHER TAKING ACTION** *(Complete within 2 business days)*

Received By (Name): \_\_\_\_\_ Receipt Date: \_\_\_\_\_ Phone: \_\_\_\_\_

Results/Findings of Investigation (Please attach photos, and additional sheets if needed): \_\_\_\_\_

Root-Cause Analysis (underlying, system-related reason why an incident or hazard occurred): \_\_\_\_\_

Description of Corrective Action (due within 2-days of receipt): \_\_\_\_\_

Action Taken By: (Name): \_\_\_\_\_ Dept/Div: \_\_\_\_\_

Corrective Action Due Date: \_\_\_\_\_ Date Copy of Form Sent to Originator/Employee: \_\_\_\_\_

IndustrySafe System ID# \_\_\_\_\_ Resolved \_\_\_\_\_ Not Resolved \_\_\_\_\_ (Send copy to Safety & Compliance)

**3: REVIEWED BY DIVISION SUPERINTENDENT/MANAGER** *(Complete within 3 business days upon receipt)*

Received By (Name): \_\_\_\_\_ Receipt Date: \_\_\_\_\_ Phone: \_\_\_\_\_

Review of Effectiveness of Corrective Action Comments on Review: \_\_\_\_\_

**4: SAFETY & COMPLIANCE DEPARTMENT**

Received By (Name): \_\_\_\_\_ Receipt Date: \_\_\_\_\_ Phone: \_\_\_\_\_

Action Taken or Recommended: \_\_\_\_\_

(If appealed in writing, within 10 days add to applicable Joint Safety Committee agenda)

Actual/Projected Completion Date: \_\_\_\_\_ (Refer to IndustrySafe for additional information and updates)

**5: RECOMMENDED DISPOSITION FROM JOINT SAFETY COMMITTEE (If Referred or Appealed)**

Instructions, Distribution, and Appeals on Reverse

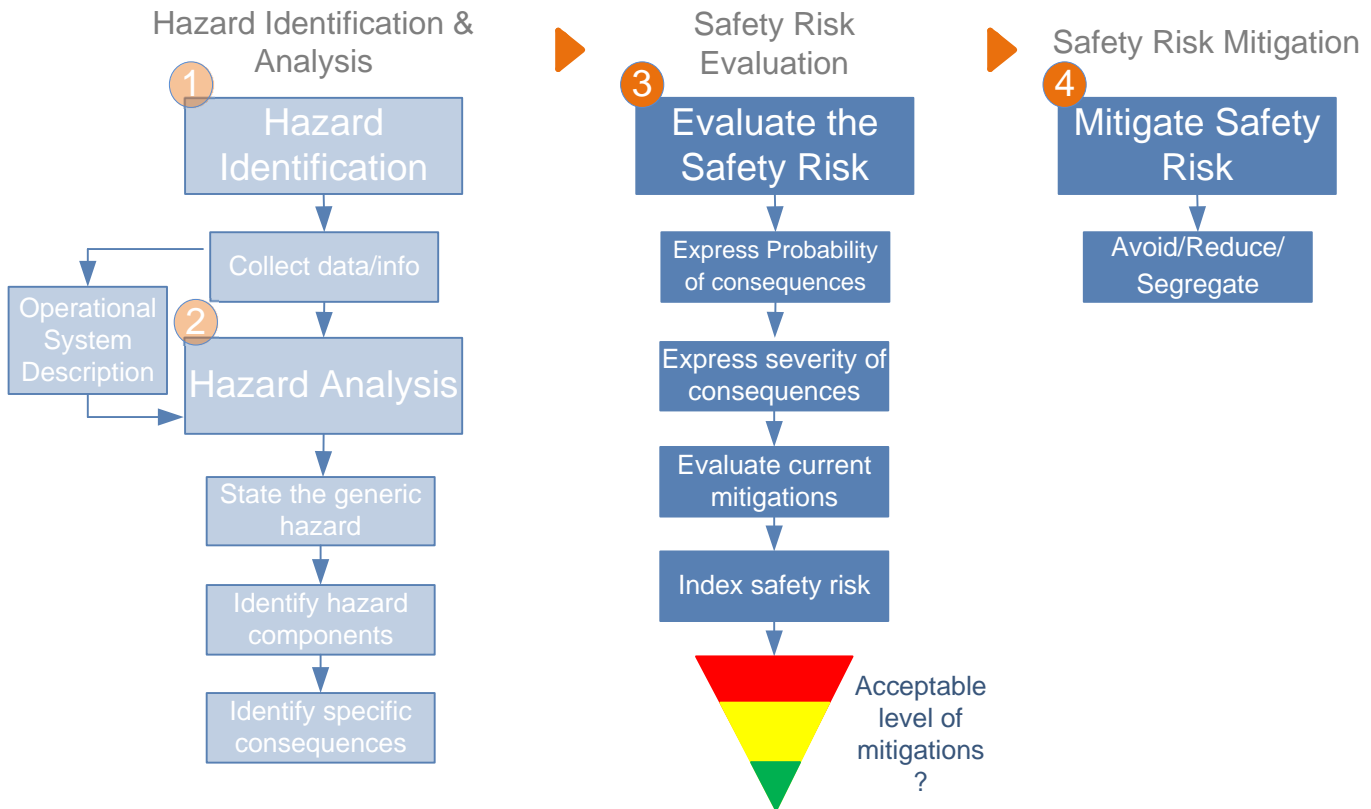
# COS-SAF-FR-3002B Appendix B

## SMS principles for Transit- Safety Risk Management

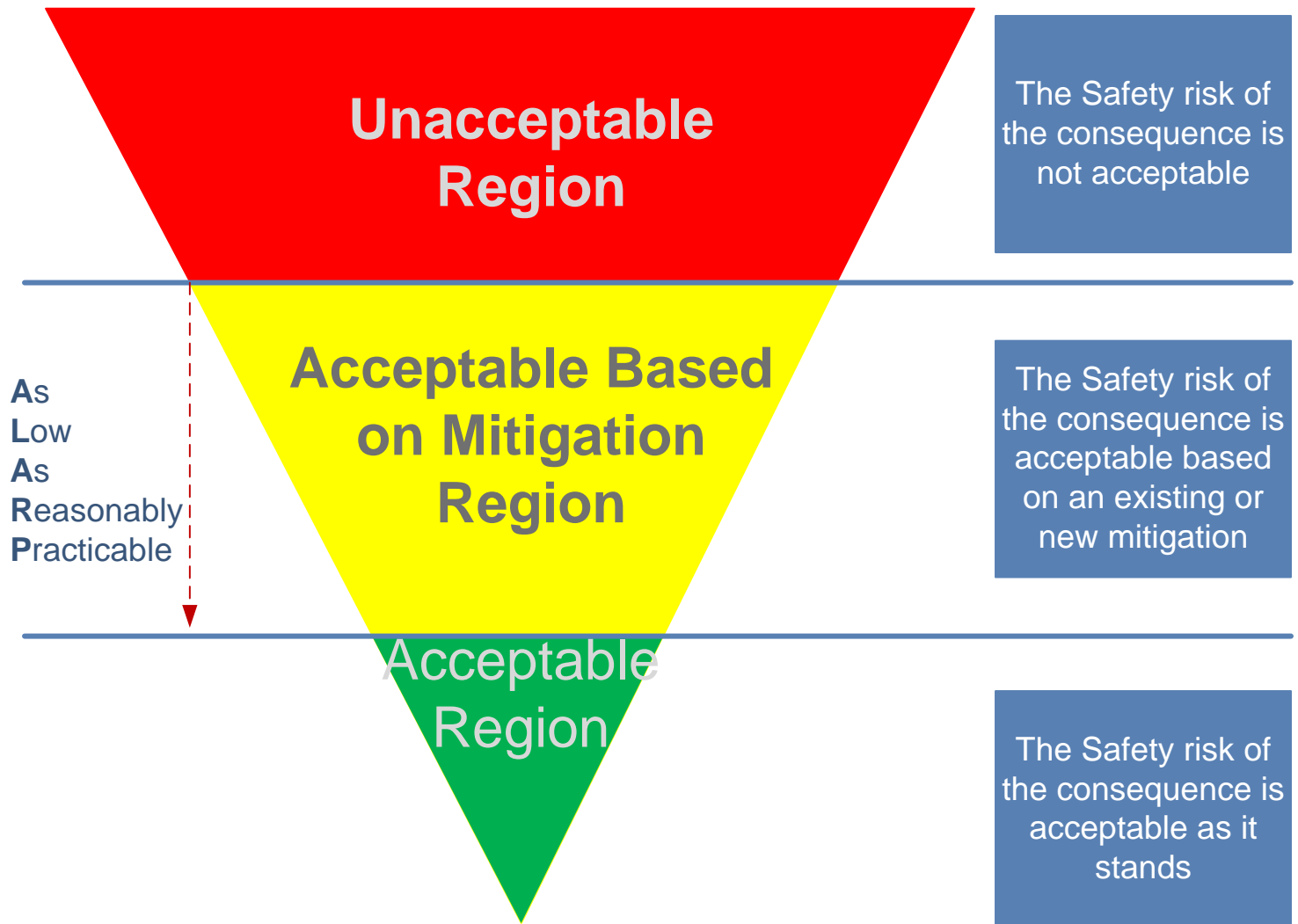
### SRM Sub-Components



### Safety Risk Evaluation and Mitigation



## Safety Risk Tolerance



The triangle is a visual representation of safety risk in three general categories: acceptable, acceptable with mitigation, and unacceptable. In determining what is “reasonably practicable” in the context of Safety Risk Management, consideration should be given both to the technical feasibility of further reducing the safety risk, and cost. Showing that the safety risk is As Low As Reasonably Practicable (ALARP) means that further safety risk reduction is either impracticable or grossly outweighed by the cost. It should, however, be realized that when a transit agency “accepts” a safety risk, this does not mean that the potential consequences of hazards have been eliminated. Instead, it means that the potential consequences of a hazard are either low enough or have been mitigated by the transit agency so that any further effort would not be practical or beneficial.



## Safety Risk Probability Table

<b>PROBABILITY LEVELS</b>			
<b>Description</b>	<b>Level</b>	<b>Specific Individual Item</b>	<b>Fleet or Inventory</b>
<b>Frequent</b>	<b>A</b>	Likely to occur often in the life of an item.	Continuously experienced.
<b>Probable</b>	<b>B</b>	Will occur several times in the life of an item.	Will occur frequently.
<b>Occasional</b>	<b>C</b>	Likely to occur sometime in the life of an item.	Will occur several times.
<b>Remote</b>	<b>D</b>	Unlikely, but possible to occur in the life of an item.	Unlikely, but can reasonably be expected to occur.
<b>Improbable</b>	<b>E</b>	So unlikely, it can be assumed occurrence may not be experienced in the life of an item.	Unlikely to occur, but possible.
<b>Eliminated</b>	<b>F</b>	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

The measuring goes from A to F with A being frequent or likely to occur frequently and E being improbable or expected that this event will most likely never occur. The designation F is used when potential hazards are identified and later eliminated.

## Safety Risk Severity Table

<b>SEVERITY CATEGORIES</b>		
<b>Description</b>	<b>Severity Category</b>	<b>Mishap Result Criteria</b>
<b>Catastrophic</b>	<b>1</b>	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M.
<b>Critical</b>	<b>2</b>	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M.
<b>Marginal</b>	<b>3</b>	Could result in one or more of the following: injury or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1M.
<b>Negligible</b>	<b>4</b>	Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact, or monetary loss less than \$100K.

Like the probability table, the safety risk severity table presents typical safety risk severity levels. It includes four categories to denote the level of severity of the occurrence of a consequence, the meaning of each category, and assignment of a value of each category using numbers. In this table, 1 is considered Catastrophic meaning possible deaths and equipment destroyed and 4 is considered negligible or of little consequence with two levels in between.

# COS-SAF-FR-3002C (MIL-STD-882E Safety Risk Matrix)

## Safety Risk Matrix

MIL-STD-882E		RISK ASSESSMENT MATRIX			
SEVERITY \ PROBABILITY	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)	
Frequent (A)	1A High	2A High	3A Serious	4A Medium	
Probable (B)	1B High	2B High	3B Serious	4B Medium	
Occasional (C)	1C High	2C Serious	3C Medium	4C Low	
Remote (D)	1D Serious	2D Medium	3D Medium	4D Low	
Improbable (E)	1E Medium	2E Medium	3E Medium	4E Low	
Eliminated (F)	Eliminated				

1A, 1B, 1C, 2A, 2B

**High**

Unacceptable

1D, 2C, 3A, 3B

**Serious**

Undesirable with management decision required

1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B

**Medium**

Acceptable with review by management

4C, 4D, 4E

**Low**

Acceptable without review