



Company Operations Standard Safety - SDG&E

Workplace Violence Prevention Plan	SDG&E:	G8351
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PURPOSE San Diego Gas and Electric has established and implemented the Workplace Violence Prevention Plan (“WVPP”) to maintain a safe and secure work environment for all employees, vendors, contractors, customers, and other visitors. SDG&E employees must refrain from engaging in any acts or threats of violence in the workplace and are responsible for assisting in maintaining a workplace free of acts/threats of violence.

1. POLICY AND SCOPE

- 1.1. The WVPP applies at all times and in all work areas, including company worksites, offices, parking lots, and offsite locations where Workplace Violence incidents may occur. This WVPP applies to anyone who enters SDG&E workplaces or worksites, including current or former employees, visitors, customers, staff, contractors, vendors, and volunteers.
- 1.2. The WVPP does not apply to employees teleworking from a location of the employee’s choice, which is not under the control of SDG&E.
- 1.3. Employees who exhibit any level of violent behavior, or who make threats or otherwise violate this WVPP or the Violence in the Workplace Policy, may be subject to disciplinary action, up to, and including, immediate termination of employment, and other actions, as necessary, to address the misconduct. Non-employees are subject to exclusion from any Company property and may be subject to other actions, as necessary, to address the misconduct. Employees, as well as all other individuals covered by this WVPP, are prohibited from bringing any dangerous weapon(s) or ammunition into the workplace, including parking lots, outside areas, and walkways, even when done without any intention to threaten or intimidate others. The only exceptions to this are members of law enforcement and Corporate Security personnel who are licensed and authorized to carry such weapons in connection with their work. For additional information please reference the Sempra [Violence in the Workplace Policy](#).

2. PROCEDURES

- 2.1. Development of the WVPP
 - 2.1.1. Employees can actively participate in developing and implementing the WVPP through various communications, including participation in identifying and evaluating Workplace Violence hazards and in participating in the development of the training. Employee communications include the online Workplace Violence training, the Violence in the Workplace Policy, site-specific contacts identified on the intranet, and ongoing interactions with employees through investigations and responding to concerns. Employees interested in participating in the development and implementation of this plan should contact the WVPP Administrator.
- 2.2. Review of the WVPP



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2.2.1. The WVPP will be reviewed at least annually by the WVPP Administrator or a team delegated to review the plan. A review of the WVPP will be included as part of the Post-Incident Evaluation process after a Workplace Violence incident occurs. When a deficiency is observed or becomes apparent, the appropriate manager responsible for fixing the deficiency will review the WVPP. Proposed updates to the WVPP will be submitted to the WVPP Administrator. In addition, the WVPP will be reviewed as part of the Standards Review Process.

2.3. Inspections

2.3.1. Inspections will be conducted to identify and evaluate unsafe conditions and work practices. Employee reports and concerns will be responded to and addressed. Inspections will be conducted:

2.3.1.1. When the WVPP is first established;

2.3.1.2. After each Workplace Violence incident; and

2.3.1.3. Whenever the Company is made aware of a new or previously unrecognized hazard related to Workplace Violence.

2.3.2. Corporate Security will conduct the inspections with the assistance of other departments, as needed, and keep records of the inspections for future reference. Inspections will be completed for company facilities; other locations may be inspected on a case-by-case basis. The Facility Inspection and Post-Incident Evaluation form will be used for all inspections.

2.3.3. If an inspection/assessment identifies a Workplace Violence hazard, corrective measure(s) will be implemented in a timely manner, consistent with California Code of Regulations Section 3203. Engineering and work practice controls will be used or implemented to eliminate or minimize employee exposure to the identified Workplace Violence hazards to the extent feasible and/or as required. Interim measure(s) may be required based on the nature of the hazard.

2.4. Training

2.4.1. All employees working at the Company will receive effective training that addresses the Workplace Violence risks that the employees are reasonably anticipated to encounter in their jobs. Training will be provided through *MyLearning* or in person. The WVPP Administrator, or designee(s), will review and modify the training materials as appropriate.

2.4.2. Training will be provided to all employees when the WVPP is first established and annually thereafter, as well as when an employee is newly hired or transferred to a new department/location or assigned to perform duties for which training was not previously provided. Additional training



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will be provided if a new or previously unrecognized Workplace Violence hazard has been identified or when changes are made to the WVPP (but may be limited to addressing the new hazard or change).

2.4.3. Initial training will include:

2.4.3.1. An explanation of the WVPP, including how to obtain a copy of the WVPP and how to participate in development and implementation of the WVPP;

2.4.3.2. The definitions and requirements of the WVPP;

2.4.3.3. How to report Workplace Violence incidents or concerns to the Company or law enforcement without fear of reprisal;

2.4.3.4. Workplace Violence hazards specific to the employees' jobs, and any corrective measures that the Company has implemented;

2.4.3.5. How to seek assistance to prevent or respond to violence and strategies to avoid physical harm;

2.4.3.6. An explanation of the Company's VI Log and how to obtain copies of records per Section 2.9;

2.4.3.7. An opportunity for interactive questions and answers with a person knowledgeable about the WVPP.

2.5. Coordination with Contractors

2.5.1. As part of the contracting process, Supply Management will inform Company Contractors of how to obtain the WVPP to ensure that those contractors and their employees understand their respective roles, as provided in the plan.

2.5.1.1. Contractors will train their employees on:

2.5.1.1.1. Workplace Violence prevention consistent with the applicable regulations.

2.5.1.1.2. The process to report, investigate, and record incidents to the contractor.

2.5.2. At a multiemployer worksite, the employer(s) whose employees experienced the Workplace Violence incident will record the information in a Violent Incident Log and will also provide a copy of that log to the controlling employer.

2.5.3. Upon initial implementation of the WVPP, Supply Management will send a letter or email to current Contractors that already have in place a contract



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with the Company with information on how to obtain a copy of the WVPP. It is the Contractor's responsibility to communicate the plan to their employees working at Company worksites.

2.6. Reporting Workplace Violence Incidents or Concerns

2.6.1. General communications between the Company and employees regarding Workplace Violence include the following:

2.6.1.1. Employees are encouraged to immediately communicate any potential or actual Workplace Violence concerns or conditions that may increase the potential of Workplace Violence incidents to supervisors, Human Resources, Corporate Security, or the Ethics and Compliance Help Line.

2.6.1.2. Employees should report security equipment issues to CorporateSecurity@sempra.com.

2.6.1.3. Employees should report all Workplace Violence incidents immediately, as outlined in the [Incident Reporting Procedures](#).

2.6.1.4. Supervisory employees are expected to take all communications regarding Workplace Violence seriously.

2.6.1.5. Employees will not be retaliated against for communicating any Workplace Violence concerns or conditions, or for reporting any Workplace Violence incident.

2.6.1.6. Employees reporting concerns will be informed of the results and any corrective action(s) by the department that is conducting the investigation.

2.7. Response to a Workplace Violence Emergency

2.7.1. Emergency Notifications – In the event of a Workplace Violence Emergency, employees will be alerted of the presence, location, and nature of Workplace Violence emergencies by use of intercom message, text message, email, and/or telephone call.

2.7.2. Evacuation Plans – Facility specific evacuation plans to assist with egress are posted at each facility and within their Emergency Action and Fire Prevention Plan (EAP) available on the intranet.

2.8. Post-Incident Response and Incident Investigation Report

2.8.1. The incident investigation report will be performed and written by assigned personnel from Corporate Security. The incident investigation report will include, as applicable, the following:



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- 2.8.1.1. The necessary information for completing the Violent Incident Log.
 - 2.8.1.2. An inspection/visitation of the scene of the incident as soon as possible.
 - 2.8.1.3. Opinions and statements from the threatened or injured employee(s), or other person on premise and other personnel involved in the incident regarding the potential cause(s) of the incident, and whether they believe any measure would have helped to prevent any threat or injury.
 - 2.8.1.4. A review of security systems.
 - 2.8.1.5. A determination of the likely cause of the incident.
 - 2.8.1.6. A description of any corrective action to be taken to prevent similar incidents from recurring.
 - 2.8.1.7. A description of any corrective actions taken as a result of the findings.
- 2.9. Violent Incident Log
- 2.9.1. Information will be recorded on the VI Log for every Workplace Violence incident. The information recorded for each incident will be based on information solicited from the employees or other victims who reported or experienced the Workplace Violence and on witness statements and investigation findings.
 - 2.9.2. At a multiemployer worksite, the employer(s) whose employees experienced the Workplace Violence incident will record the information in their own VI Log and provide a copy of the log entry to the controlling employer.
 - 2.9.3. The information recorded in the VI Log will include, but may not necessarily be limited to, the following:
 - 2.9.3.1. The date, time, and location of the incident;
 - 2.9.3.2. The Workplace Violence type(s), as described in Section 4.7.3, involved in the incident;
 - 2.9.3.3. A detailed description of the incident;
 - 2.9.3.4. A classification of who committed the violence, including whether the perpetrator was a client/customer, family/friend of a client/customer, stranger with criminal intent, coworker, supervisor/manager, partner/spouse, parent/relative, or other perpetrator;



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- 2.9.3.5. A classification of circumstances at the time of the incident, including whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, in a high crime area, isolated or alone, unable to get help or assistance, working in a community setting, working in an unfamiliar or new location, or other circumstances;
- 2.9.3.6. A classification of where the incident occurred, including whether it was in a certain room or office, hallway, waiting room, restroom or bathroom, parking lot or other area outside the building, personal residence, break room, cafeteria, or other area;
- 2.9.3.7. The type of incident that occurred, including whether the incident involved:
 - 2.9.3.7.1. Physical attack, including biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting;
 - 2.9.3.7.2. Attack with a weapon or object, including a gun, knife, or other object;
 - 2.9.3.7.3. Threat of physical force or threat of the use of a weapon or other object;
 - 2.9.3.7.4. Sexual assault or threat, including rape/attempted rape, physical display, or unwanted verbal/physical sexual contact;
 - 2.9.3.7.5. Animal attack; or
 - 2.9.3.7.6. Other.
- 2.9.3.8. Consequences of the incident, including:
 - 2.9.3.8.1. Whether law enforcement was contacted;
 - 2.9.3.8.2. Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident, if any;
- 2.9.3.9. Information about the person completing the VI Log including their name, job title, and the date completed.
- 2.9.4. When providing the VI Log upon request, elements of personal identifying information sufficient to allow identification of any person involved in a violent incident, such as the person's name, address, email address, telephone number, or social security number, or other information that, alone or in



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combination with other publicly available information, reveals the person's identity will be omitted.

2.10. Recordkeeping

- 2.10.1. Hazard Assessments: Records of Workplace Violence hazard identification, evaluation, and correction will be created and maintained by Corporate Security for a minimum of five (5) years.
- 2.10.2. Training Records: Workplace Violence training records will be created and maintained for a minimum of one (1) year and will include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, if applicable, and names and job titles of all persons attending the training sessions.
- 2.10.3. VI Logs: VI Logs will be maintained by Corporate Security for a minimum of five (5) years.
- 2.10.4. Records of Workplace Violence Incident Investigations: Records of Workplace Violence incident investigations will be maintained by Corporate Security for a minimum of five (5) years. These records will not contain "medical information," as defined by California Civil Code Section 56.05(j).
- 2.10.5. Cal/OSHA Access to Records: All required records will be made available to Cal/OSHA upon request for examination and copying.
- 2.10.6. Employee Access to Records: Hazard assessment records, training records, and VI logs will be made available to employees and their representatives (if any), upon request and without cost, for examination and copying within 15 calendar days of a request.

3. RESPONSIBILITIES

- 3.1. WVPP Administrator (Kristin Hamon, Safety Compliance Manager, khamon@sdge.com) – The WVPP Administrator has the overall authority and responsibility for implementing the provisions of this WVPP including, ensuring compliance and approval of updates.
- 3.2. Safety (Kristin Hamon, Safety Compliance Manager, khamon@sdge.com) – Responsible for acting as the main liaison for Cal/OSHA, providing Cal/OSHA with any technical assistance, and monitoring changes to Cal/OSHA regulations. Managing WVPP updates, overseeing training and communications to employees, and other employers whose employees work in the same place of employment.
- 3.3. Corporate Security (Jim Hinton, International Security and Executive Services Manager, jhinton1@sempra.com) – Responsible for providing subject matter expert assistance for training, response to emergency violent incidents, managing the



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records for violence incidents on the VI log, leading or assigning a team lead for the investigations, inspections, and incident response.

- 3.4. Human Resources (Laura Whiteman, Human Resources Manager, LJWhite1@sdge.com) – Responsible for managing and implementing potential disciplinary actions, coordinating with Corporate Security to assist with investigations, and providing referrals to Wellness and other employee assistance programs to obtain benefits, and coordinating any large company response to incidents, such as on-site counselors.
 - 3.5. Supervisor – Responsible for answering employee questions about the WVPP and ensuring communication of violent incidents are reported to Corporate Security.
 - 3.6. Responsible Manager or Site Manager – Responsible for implementing and maintaining the WVPP in their work areas.
 - 3.7. Employees – Responsible for complying with the WVPP, promptly and accurately reporting all Workplace Violence incidents, threats, or other Workplace Violence concerns, and seeking clarification about the WVPP, as needed.
4. DEFINITIONS
- 4.1. Dangerous weapon: An instrument capable of inflicting death or serious bodily injury. For example, firearms, knives, or other dangerous weapons. For further information reference [Violence in the Workplace Policy](#).
 - 4.2. Emergency: Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
 - 4.3. Engineering controls: An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.
 - 4.4. 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.
 - 4.5. Violent Incident Log: The online database maintained by Corporate Security to record every Workplace Violence incident with specified information required to be recorded. It is also known as the “VI Log”.
 - 4.6. Work practice controls: Procedures, rules, and staffing that are used to effectively reduce Workplace Violence hazards.
 - 4.7. Workplace Violence: Any act of violence or threat of violence that occurs in a place of employment. The term Workplace Violence does not include lawful acts of self-



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defense or defense of others. Workplace Violence includes, but is not limited to, the following:

- 4.7.1. The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury;
- 4.7.2. 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; and
- 4.7.3. The following four Workplace Violence types:
 - 4.7.3.1. “Type 1 violence,” which means 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 workers with the intent to commit a crime.
 - 4.7.3.2. “Type 2 violence,” which means Workplace Violence directed at employees by customers, clients, or visitors.
 - 4.7.3.3. “Type 3 violence,” which means Workplace Violence against an employee by a current or former employee, supervisor, or manager.
 - 4.7.3.4. “Type 4 violence,” which means Workplace Violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

5. REFERENCES

- 5.1. [California Labor Code 6409.1](#)

6. SAFETY REVIEW PROCESS

This Safety Standard was reviewed and approved by: Corporate Security, Sempra Labor and Employment, SDG&E Safety Services, Human Resources

7. APPENDICES – Not Applicable

8. PROTECTED SECTIONS AND WORDING

The following sections and wording in this document cannot be altered or deleted without prior approval from Pipeline Safety & Compliance and Legal:

Section	Protected Wording (Underlined ONLY)	Justification	Date Wording Added
Not Applicable	Not Applicable	Not Applicable	Not Applicable



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INTERNAL



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