**Code Enforcement Officer Safety Standards**

**Instructions**

The following template is provided to assist you with the preparation and implementation of Code Enforcement Officer Safety Standards in order to assist your city in complying with [SB 296](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB296) and [Title 8, California Code of Regulations, §3203. Injury and Illness Prevention Program](https://www.dir.ca.gov/title8/3203.html). You will need to modify and customize several areas within this template to address the site-specific hazards that your Code Enforcement Officers may encounter and will be indicated by BLUE TEXT. Due to the potential for use of force claims should your city choose to provide devices such as batons, tasers, or pepper spray, it is strongly recommended that the policy be reviewed by your City Attorney and the highest ranking Human Resources employee (i.e., Human Resources Director) at your city.

**Name of City**

**Code Enforcement Officer Safety Standards**

**Insert Date**

**TABLE OF CONTENTS**

[Policy 1](#_Toc105491152)

[Workplace Security Safe Work Practices 1](#_Toc105491153)

[Workplace Risk Assessment 1](#_Toc105491154)

[Engineering and Administrative Controls 2](#_Toc105491155)

[Personal Protective Equipment & Other Safety Devices 2](#_Toc105491156)

[Training 3](#_Toc105491157)

[Emergencies and Reporting 4](#_Toc105491158)

[Post Incident Response and Investigation 4](#_Toc105491159)

[Recordkeeping 5](#_Toc105491160)

[Annual Review 5](#_Toc105491161)

Appendix

1. Workplace Violence Incident Log
2. Workplace Security Assessment & Control Checklist
3. Job Hazard Analysis for Personal Protective Equipment Assessment

# Policy

INSERT NAME OF CITY is committed to providing a safe work environment for its Code Enforcement Officers. Our policy is to establish, implement, and maintain an effective Injury and Illness Prevention Program as required by [Title 8, California Code of Regulations, §3203](https://www.dir.ca.gov/title8/3203.html) and to establish minimum Code Enforcement Officer Safety Standards as required by [SB 296](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB296). These standards will be appropriate for the officers within our jurisdiction.

These Code Enforcement Officer Safety Standards are available upon request for examination and copying to our employees, their representatives, and the Chief of Cal/OSHA or his or her designee.

# Workplace Security Safe Work Practices

In order to reduce the potential for incidents of workplace violence, Code Enforcement staff will follow the safe work practices listed below:

* Staff shall eliminate all distractions and not do anything that will preoccupy them from safety making observations and interacting with the public.
* Staff shall ensure they always identify an escape route when entering a building or other worksite.
* Staff shall be alert for warning signs of aggression from both people and animals.
* The use of body language, choice of words, and tone shall be used to de-escalate a potentially hostile situation.
* If de-escalation is not effective, staff shall end the communication and immediately leave the area.
* Staff are expected to know their location and must be able to report it in the case of an emergency.
* If staff observes an immediate or direct threat to life, they shall take immediate steps to ensure their safety and the safety of others, which may include the use of a reasonable amount of force necessary to mitigate the threat and allow for evacuation or escape from the area. As soon as it is safe to do so, such action shall be reported to law enforcement and a supervisor.
* Field staff are encouraged to work in pairs and/or collaborate with the local law enforcement.
* Staff are required to immediately report all security or safety issues to a supervisor, which may include a written report.

# Workplace Risk Assessment

Prior to assigning Code Enforcement Officers to field duties, a workplace risk assessment will be completed. This assessment will include two primary components:

1. Workplace Security Assessment
2. General Employee Safety Assessment

The workplace security assessment will include an assessment of the tasks and exposures that could create the potential for incidents of workplace violence, which could result in attacks on Code Enforcement Officers by other people or animals.

The Workplace Security Assessment (Appendix B) can be used to assist with the security assessment. Inspections are performed according to the following schedule:

* Once a year;
* When new, previously unidentified workplace violence/security hazards are recognized; and
* When workplace violence injuries or threats of injury occur.

The general safety assessment will include an assessment of all other task and exposures that could result in occupational injuries and illnesses, such as strains/sprains, chemical exposures, repetitive motion injuries, etc. The Job Hazard Analysis Form for Personal Protective Equipment (Appendix C) can be completed to conduct this assessment.

# Engineering and Administrative Controls

INSERT NAME OF CITY will implement engineering and administrative controls to reduce the potential for incidents of workplace violence. The following protocols will be implemented:

Based on the completion of the workplace risk assessment, list the engineering and administrative controls that will be implemented.

* Staff will avoid in person visits with potentially hostile persons by scheduling phone or virtual meetings;
* Staff will coordinate and schedule on-site visits with the local police or sheriff’s department, and they will be on scene when visits and inspections are conducted;
* Two Code Enforcement Officers will be assigned to all on-site visits in high crime areas or areas where there are potentially hostile persons.

# Personal Protective Equipment & Other Safety Devices

INSERT NAME OF CITY will utilize the following pieces of personal protective equipment (PPE) and other safety devices. The following protocols will be implemented:

Based on the completion of the workplace risk assessment, the list the types of personal protective equipment that will be provided.

* Ballistic vests (mandatory or voluntary) Approval by Legal Counsel Recommended
* Pepper spray (mandatory or voluntary) Approval by Legal Counsel Recommended
* Latex gloves (mandatory or voluntary)
* Kevlar gloves (mandatory or voluntary)
* Police Radio (mandatory)
* City issued cell phones (mandatory)
* Flashlight (voluntary)
* N-95 respirators (mandatory or voluntary)

Note: It is recommended that the use of items such as ballistic vests or items that could result in a use of force (pepper spray, tasers, batons, etc.) or the inclusion of such items in this policy be reviewed by the agency’s legal counsel and approved by the City Manager and the highest-ranking Human Resources employee (i.e. Human Resources Director). It is also recommended City staff consult with the local law enforcement agency to determine what types of PPE or safety equipment are appropriate and to coordinate responses to high-risk activities.

# Training

INSERT NAME OF CITY will provide employee training on the Code Enforcement Safety Standards to all affected staff. Employee training will include:

* Code Enforcement Safety Standards;
* Workplace violence risks that employees may encounter in their jobs;
* How to recognize the potential for violence and escalating behavior;
* Strategies to de-escalate behaviors and to avoid physical harm;
* How to report incidents to their supervisor and law enforcement; and
* INSERT NAME OF CITY’s Employee Assistance Program.

Employees assigned to field duties where they may encounter potentially violent individuals will receive additional training that includes:

* General and personal safety measures;
* Aggression and violence predicting factors;
* The assault cycle;
* Characteristics of aggressive and violent patients and victims;
* Verbal intervention and de-escalation techniques and physical maneuvers to defuse and prevent violent behavior;
* Strategies to prevent physical harm.

Training will occur:

* At time of hire or transfer;
* Annually for employees performing field contact activities and their supervisors;
* When new equipment or work practices are introduced; and
* When a new or previously unrecognized workplace violence hazard has been identified.

Employees who receive training in a form other than live training will have the opportunity to meet with a person knowledgeable on the Code Enforcement Safety Standards within three business days of the training for interactive questions to be answered.

# Emergencies and Reporting

**Emergencies and Reporting a Crime**

For immediate assistance in an emergency that is not associated with a service call, contact emergency services or law enforcement by calling 911. For immediate assistance in an emergency associated with a service call in progress, follow internal procedures for requesting immediate back-up assistance by notifying local law enforcement.

**Reporting Workplace Violence Concerns**

Employees who witness or experience *threats of violence* or *workplace violence* can report the incident through their chain of command or directly to Human Resources. Employees may report anonymously and without fear of reprisal by submitting the incident in writing through interoffice mail.

**Restraining Orders**

Employees or other personnel affiliated with the INSERT NAME OF CITY who have an active restraining order issued against another person that includes the workplace are encouraged to provide a copy of the restraining order to their supervisor. Supervisors who receive notification of a restraining order that includes the workplace will meet with the Human Resources Director or highest-ranking Human Resources employee to decide what actions, if any, need to be initiated.

# Post Incident Response and Investigation

Supervisors will use the Workplace Violence Incident Log (Attachment A) to assist in documenting incidents and investigations.

The following procedures will occur following an incident:

* Provide immediate medical care or first aid;
* Identify all employees involved in the incident;
* Offer staff individual trauma counseling resources;
* Conduct a debriefing with all affected staff;
* Determine if corrective measures developed under this Program were effectively implemented; solicit feedback from all personnel involved in the incident as to the cause of this incident and if injuries occurred, how injury could have been prevented; and
* Record the incident in the Workplace Violence Incident Log.

# Recordkeeping

* Records of workplace security hazard assessment, evaluation, and correction will be maintained for three years in accordance with the recordkeeping requirements of the INSERT NAME OF CITY’s Injury and Illness Prevention Program.
* Training for each employee, including the employee’s name, training dates, type of training, and training provider will be maintained for a minimum of three years.
* Records of violent incidents (Workplace Violence Incident Log) will be maintained a minimum of five years.

# Annual Review

INSERT NAME OF CITY’s Code Enforcement Officer Safety Standards will be reviewed annually and updated as needed considering the following criteria:

* Prior year incidents;
* Sufficiency of security safe work practices;
* Sufficiency of PPE;
* Job, equipment, and facility design and risks;
* Modifications or additions to tasks and procedures that affect officer safety;
* Newly identified hazards;
* Identified deficiencies; and
* Feedback provided by employees and their representatives.

**Appendix A**

**WORKPLACE VIOLENCE** **INCIDENT LOG**

This form must be completed for every record of violence in the workplace.

|  |  |  |
| --- | --- | --- |
| **Incident ID #\*:** | **Date and Time of Incident:** | **Department:** |
| **Specific Location of Incident:** |

*\* Do not identify employee by name, employee #, or SSI. The Incident ID must not reflect the employee’s identity)*

**Describe Incident** (Include additional pages if needed):

|  |
| --- |
|  |

**Assailant information:**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| [ ]  | Resident/Homeowner | **[ ]**  | Client | [ ]  | Customer |
| **[ ]**  | Family or Friend of Resident | **[ ]**  | Family or Friend of Client | **[ ]**  | Family or Friend of Customer |
| [ ]  | Partner/Spouse of Victim  | [ ]  | Parent/Relative of Victim  | [ ]  | Co-Worker/Supervisor/Manager |
| [ ]  | Former Partner/Spouse of Victim | [ ]  | Animal  | [ ]  | Person In Custody |
| [ ]  | Robber/Burglar | [ ]  | Passenger | [ ]  | Stranger |
| [ ]  | Student | [ ]  | Other: |

**Circumstances at time of incident:**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| [ ]  | Employee Performing Normal Duties  | **[ ]**  | Poor Lighting | [ ]  | Employee Rushed |
| **[ ]**  | Employee Isolated or Alone  | **[ ]**  | High Crime Area | **[ ]**  | Low Staffing Level  |
| [ ]  | Unable to Get Help or Assistance  | [ ]  | Working in a Community Setting  | [ ]  | Unfamiliar or New Location |
| [ ]  | Other: |  |

**Location of Incident:**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| [ ]  | Personal Residence  | **[ ]**  | Apartment Building | [ ]  | Hallway |
| **[ ]**  | Public or Private Street  | **[ ]**  | Restroom or Bathroom | **[ ]**  | Parking Lot or Outside Building |
| [ ]  | Business or Commercial Property  | [ ]  | Breakroom  | [ ]  | Public Building |
| [ ]  | Other: |

**Type of Incident (check as many apply):**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| [ ]  | Robbery  | **[ ]**  | Grabbed | [ ]  | Pushed |
| [ ]  | Verbal Threat or Harassment  | **[ ]**  | Kicked | [ ]  | Scratched |
| [ ]  | Sexual Threat, Harassment, or Assault  | **[ ]**  | Hit with an Object  | [ ]  | Bitten |
| [ ]  | Animal Attack | **[ ]**  | Shot (or Attempted)  | [ ]  | Slapped |
| **[ ]**  | Threat of Physical Force  | **[ ]**  | Bomb Threat | **[ ]**  | Hit with Fist |
| [ ]  | Threat of Use of Weapon or Object  | [ ]  | Vandalism (of Victim’s Property) | [ ]  | Knifed (or Attempted) |
| [ ]  | Assault With A Weapon or Object | [ ]  | Vandalism (of Employer’s Property)  | [ ]  | Arson |
| [ ]  | Robbery | [ ]  | Other: |

**Consequences of incident:**

|  |  |  |
| --- | --- | --- |
| Medical care provided? [ ]  Yes [ ]  No  | Law enforcement called? [ ]  Yes [ ]  no | Security contacted? [ ]  Yes [ ]  No  |
| Did anyone provide assistance to conclude the event? [ ]  Yes [ ]  No | Days lost from work (if any) |  |
| Actions taken by employer to protect employees from a continuing threat? [ ]  Yes [ ]  No |

**Completed by:**

|  |  |  |
| --- | --- | --- |
| Name: | Title: | Date: |
| Telephone: | Email: |
| Signature: |

**Appendix B**

**WORKPLACE SECURITY ASSESSMENT & CONTROL CHECKLIST**

|  |  |
| --- | --- |
| **Assessed by:**  | **Title:** |
| **Location(s) Assessed:** |

This checklist is designed to evaluate the workplace and job tasks to help identify situations that may place employees at risk of workplace violence.

Step 1: Identify risk factors that may increase INSERT NAME OF CITY’s vulnerability to workplace violence events

Step 2: Conduct a workplace assessment to identify physical and process vulnerabilities

Step 3: Develop a corrective action plan with measurable goals and target dates

**STEP 1: IDENTIFY RISK FACTORS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Yes** | **No** | **Risk Factors** | **SAFE TASK PROCEDURE OR RECOMMENDATION** **(Engineering, Admin, or PPE Controls)** |
|  |  | Does staff work alone? If yes, how often do they work alone? |  |
|  |  | Is the workplace located in an area with a high crime rate? |  |
|  |  | Does staff enter areas with high crime rates? |  |
|  |  | Does staff perform public safety functions that might put them in conflict with others? |  |
|  |  | Does staff perform duties that may upset people? |  |
|  |  | Does staff ever have to obtain inspection and/or abatement warrants? If yes, does staff coordinate with the police or sheriff’s department on how to make contact with the occupant and the best methods for entry? |  |
|  |  | Is law enforcement always present when an inspection warrant is served or executed? |  |
|  |  | Does staff work with people known or suspected to have a history of violence? |  |
|  |  | Do any employees have a history of threats of violence?  |  |
|  |  | Are employees notified of past workplace violence events? |  |
|  |  | Are incidents or workplace violence or threat of violence reviewed on an annual basis? |  |
|  |  | Does staff exchange money with the public? |  |
|  |  |  |  |

**STEP 2: CONDUCT ASSESSMENT**

**Security Measures**

| **Yes** | **No** |  | **Potential Recommendations** |
| --- | --- | --- | --- |
|  |  | Is there a response plan for workplace violence emergencies? |  |
|  |  | Can staff avoid in person visits with potentially hostile persons by scheduling phone or virtual meetings? |  |
|  |  | Does law enforcement accompany staff on calls? |  |
|  |  | Are staff provided with pepper spray? If yes, have they been trained, and is there a written pepper spray policy? |  |
|  |  | Is the use of pepper spray voluntary or mandatory? |  |
|  |  | Are staff provided with ballistic vests? If yes, is there a ballistic vest policy? |  |
|  |  | Is the use of ballistic vests voluntary or mandatory? |  |
|  |  | Are staff provided with a police radio (Pac set) or other communication device? If yes, describe what type of communication device is provided and the communication procedures. |  |
|  |  | Is the use of a police radio or other communication device mandatory or voluntary? |  |
|  |  | Are staff provided with City-issued cell phones? Is there a cell phone use policy? |  |
|  |  | Are there security cameras installed in locations where staff works? |  |
|  |  | Are there panic buttons? |  |
|  |  | Are there alarm systems? |  |
|  |  | Are there personal alarm devices? |  |
|  |  | Is there security provided at locations where staff works? |  |
|  |  | Is there a system to alert staff of the presence, location, and nature of a security threat? |  |
|  |  | Is there a system in place for testing security measures? If yes, when was the last time a security test was completed? |  |

**STEP 3: DEVELOP CORRECTIVE ACTION PLAN**

| **Action Item** | **Person(s) Responsible** | **Target Date** | **Status** | **Comments** |
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| --- | --- |
| Name of workplace: | Location: |
| Workplace address: | Job/task: |
| Assessment conducted by: | Signature: | Date ofassessment: |

**Appendix C**

**Job hazard analysis for Personal Protective Equipment**

**(JHA-PPE) Assessment**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Job/Task Step** | **Hazard Type** | **Hazard Source** | **Body Parts at Risk** | **Control Method\*** |
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*\* Engineering, work practice, and/or administrative hazard controls, if feasible, before requiring employees to use personal protective equipment.*