

Summary of the Congregational Violence Prevention Planning (CVPP):

The CA Violence Prevention Law (SB553) mandates the creation of a Congregational Violence Prevention Plan and also categorizes the various types of threats. The components of the plan are listed below. Types of threats (of which there are four) can be found in the document linked at the end of this summary. The CVPP must be accessible to all employees or volunteers at the congregation. This can be done via email, personal conversation, text message or phone call.

Reporting standards to Cal/OSHA remain unchanged per Title 8 CCR §330(h) and §342 (<https://www.dir.ca.gov/title8/342.html>). This is more-or-less a who, what, why, when and how along with demographic and identifying information about the parties involved. See the [link](#) for more information.

Congregations must provide training to employees. This training includes:

- The congregations CVPP;
- How to obtain a copy of the CVPP at no cost;
- How to participate in development and implementation of the CVPP;
- The definitions and requirements under Section 6401.9;
- How to report Congregational violence incidents or concerns to the leadership or law enforcement without fear of reprisal;
- Information regarding Congregational violence hazards specific to the employees' or volunteers' jobs;
- Corrective measures that the Congregation has implemented;
- How employees or volunteers can "seek assistance to prevent or respond to violence, and strategies to avoid physical harm;" and
- The Congregation's violence incident log and how to obtain copies of required records.

This training must be provided when the CVPP goes into effect and annually thereafter.

The CVPP itself must contain the following:

- **Responsible Personnel:** Designate individuals responsible for the CVPP, recommending more than one person for this role.
- **Employee Input and Enforcement:** Develop procedures for obtaining input from employees and volunteers on the plan and its enforcement.
- **Training Procedures:** Establish comprehensive training procedures covering all aspects of the CVPP.
- **Incident Reporting:** Create procedures for reporting both potential and actual Congregational violence incidents.
- **Incident Investigation:** Implement procedures for investigating potential Congregational violence incidents and issues.
- **Plan Implementation:** Set procedures for the plan's implementation, including periodic inspections, annual reviews, and ensuring comprehensive training for all employees and volunteers.
- **Anti-Retaliation Clause:** Incorporate an anti-retaliation clause to protect employees and volunteers who report Congregational violence.
- **Role Coordination:** Develop procedures for coordinating roles between leadership and the diocese.
- **Training Development:** Focus on developing effective training procedures.
- **Risk Identification:** Identify environmental and other risk factors, including considerations for contract workers, temporary staff, and remote employees.
- **Risk Evaluation and Control Development:** Create procedures for evaluating specific work-related risks (e.g., guest interactions, ushers/greeter roles, etc.) and developing appropriate controls, including engineering, administrative, and personal protective equipment.
- **Recordkeeping:** Implement procedures for maintaining records, including Congregational violence incident logs.

- **Post-Incident Response and Investigation:** Establish emergency response procedures and investigation protocols for incidents that occur.

[NOTE: While active shooter training is not required under HB 553 it is suggested that such training be included given the increasing threats of firearms related violence in places of work, worship and other "soft" targets. However, as stated, it is not mandated by the law].

Record keeping requirements are as follows: **Congregations must create and maintain training records for at least one year and other records like hazard assessments, violent incident logs, and incident investigations for at least five years.**

In addition, **Congregations must maintain a log for every Congregational violence incident, including:**

- **Date, Time, and Location of the Incident:** The log must record the specific date, time, and location where each violent incident occurred.
- **Identification of the Type of Congregational Violence:** The log should classify the incident according to the types of Congregational violence as defined in the bill.
- **Detailed Description of the Incident:** A comprehensive description of what occurred during the incident is required. This includes the nature of the violence and how it unfolded.
- **Classification of the Perpetrator:** Information on who committed the violence should be included. This could be a visitor, congregant, stranger with criminal intent, coworker, supervisor, manager, partner, spouse, parent, relative, or other.
- **Circumstances at the Time of the Incident:** The log should detail the circumstances under which the incident occurred, such as whether the employee or volunteer was performing usual job duties, working in poorly lit areas, working during a low staffing level, or in an unfamiliar location.
- **Consequences of the Incident:** Information on whether security or law enforcement was contacted, their response, and actions taken to protect employees and volunteers from a continuing threat or from any other hazards identified as a result of the incident.
- **Person Completing the Log:** The name, job title, and the date when the log was completed by the individual recording the incident.

This covers the essential information to be in compliance with the law. Further information for the creation of the CVPP, as well as additional information, can be found here:

<https://www.dir.ca.gov/dosh/puborder.asp#WVP>

Drafted by Kenneth E. Moll, member of Risk Awareness Roundtable, September 2024