

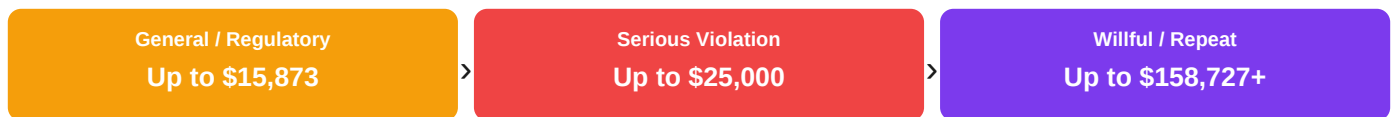
1 High Stakes & Eligibility Audit

Understanding the cost of non-compliance and whether SB 553 applies to your business.

California's SB 553 (Labor Code §6401.9) is the country's first general-industry workplace violence prevention law. It took effect **July 1, 2024** and carries real financial consequences. Before anything else, confirm your exposure — and start treating compliance as a living obligation, not a one-time checkbox.

The Three-Tier Penalty Structure

Cal/OSHA can conduct **unannounced audits** and issue citations on a per-violation basis. Fines escalate sharply for employers who show a pattern of neglect.



Penalties above do not include potential license revocations, civil litigation, or the reputational damage from a publicised incident.

Is Your Business Exempt? (30-Second Audit)

Most California employers are covered. Review the narrow exceptions below. If none apply, you are **required to comply**.

- Fewer than 10 employees AND workplace is *not* publicly accessible
- Remote-only employees working from a location the employer does *not* control
- Healthcare facilities already covered by CCR Title 8 §3342
- Dept. of Corrections / Rehabilitation facilities complying with CCR Title 7 §3203
- Law enforcement agencies compliant with POST Program + CCR Title 7 §3203
- **None of the above apply → You must comply with SB 553**

"The Living Document" mandate: SB 553 requires your WVPP to be reviewed and updated annually, after every incident, and whenever a new hazard is identified. A static PDF saved in a shared drive is a liability, not a plan.

What subilu Does Here

Subilu keeps your WVPP versioned, time-stamped, and audit-ready in the cloud. Automated annual-review reminders ensure your plan never goes stale — and every change is logged with a full edit history that satisfies Cal/OSHA's documentation requirements from day one.

2 The 13 Pillars of a Compliant WVPP

Every written Workplace Violence Prevention Plan must address all elements below.

The law mandates a **written WVPP** — either standalone or embedded in your existing Injury and Illness Prevention Program (IIPP). The plan must be specific to each work area's hazards, accessible to all employees at any time, and coordinated with any co-employers at shared worksites.

- 1 Names & roles of those responsible for implementing the plan
- 2 Procedures for active employee involvement in plan creation and updates
- 3 Coordination methods when sharing worksites with other employers
- 4 Procedures for accepting, investigating, and responding to WPV reports
- 5 Anti-retaliation policy statement — written, prominent, and enforced
- 6 Procedures for communicating WPV risks and plan updates to all employees
- 7 Training provisions (initial, annual, and hazard-triggered)
- 8 Steps to promptly correct identified and evaluated WPV hazards
- 9 Hazard identification & evaluation procedures (at launch, on schedule, post-incident, new hazard)
- 10 Emergency response protocols: alert systems, evacuation, shelter-in-place
- 11 Procedures for responding to and investigating incidents
- 12 Plan review procedures (annual, post-deficiency, post-incident)
- 13 Any additional procedures required by Cal/OSHA's Division and Standards Board

The Coordination Gap

If your employees share a worksite with workers from another employer, you must exchange your WVPP information with the controlling employer. Subilu's multi-location sharing feature generates a shareable, redacted plan summary in one click.

Retaliation-Proof Reporting Channels

The law explicitly requires that employees be able to report incidents *without fear of retaliation*. Your plan must name multiple reporting channels. Anonymous reporting is strongly recommended as a best practice.

- Direct supervisor / manager escalation pathway
- Anonymous hotline or digital reporting portal
- HR / Employee Relations team contact
- External law enforcement (for imminent threats)
- Written anti-retaliation statement in the WVPP and in training materials

Subilu Waitlist Insight: During our early-access interviews, 68% of SMB operators said they lacked a formal anonymous reporting channel. Subilu provides a built-in encrypted incident reporting portal — no third-party hotline subscription required.

3 The Violent Incident Log

Technical deep-dive: exactly what must be captured, protected, and retained.

Every incident — regardless of whether it resulted in physical injury — must be logged. The law specifies **10 mandatory data fields**, strict privacy guardrails, and a **5-year retention period**. This is the document Cal/OSHA will request first in an audit.

- 1

Date, time, and specific location of the incident
- 2

Workplace violence **Type** (see classification guide below)
- 3

Detailed narrative description of what occurred
- 4

Classification of the suspected perpetrator (role only — no names)
- 5

Circumstances at the time: staffing level, lighting, isolation, job task
- 6

Specific nature of the violent event (physical, weapon, sexual threat, animal, other)
- 7

Consequences: injuries, medical care sought, law enforcement involved
- 8

Protective actions taken immediately following the incident
- 9

Name, job title, and date of the employee who completed the log entry
- 10

Follow-up corrective actions taken after investigation

The PI/PHI Privacy Wall: The log must NEVER include personal identifying information (PII) or personal health information (PHI) for any person involved. Record classification (e.g., "coworker," "customer") not names or medical details.

Violence Type Classification Guide

Every log entry must identify which of the four legal types applies:

Type	Perpetrator	Common SMB Example
Type 1	No legitimate business connection	Robbery, stranger entering premises
Type 2	Customer, client, patient, student	Customer threatening staff after complaint
Type 3	Current or former employee	Terminated employee returning to confront manager
Type 4	Non-employee with personal connection	Domestic dispute brought into the workplace

What subilu Does Here

Subilu's guided incident log form pre-fills mandatory fields, enforces the PI/PHI privacy wall through automated redaction prompts, and auto-classifies violence type via a structured dropdown — eliminating common logging errors.

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Training & Hazard Correction Workflow

Moving beyond videos to verified compliance — and keeping the documentation to prove it.

Training is required **initially, annually**, and whenever new hazards are identified. The law does not prescribe duration or format — but it does require an *interactive* component.

The "Interactive" Training Requirement

Every training session must include an opportunity for **live Q&A with a person knowledgeable about the WVPP**. A pre-recorded video alone does not satisfy the law.

Training Content Checklist

- Overview of the employer's WVPP — how to obtain a copy and participate
- Definitions and requirements of Labor Code §6401.9
- How to report incidents without fear of retaliation (multiple channels)
- Job-specific violence hazards and corrective measures already implemented
- How to seek assistance and avoid physical harm during an incident
- What the violent incident log is, what it contains, and how to request a copy
- Interactive Q&A session — log the facilitator's name, qualifications, and duration
- Training is delivered in a language and at a literacy level appropriate for each employee

Hazard Identification & Abatement Checklist

Hazard assessments must occur at four trigger points: plan establishment, on a regular schedule, after any violent incident, and whenever a new hazard is identified.

- Physical environment survey: lighting, sight lines, access control, exits
- Staffing pattern review: isolated workers, late shifts, low-staffing periods
- Cash-handling and high-value asset exposure review
- Community / off-site worker risk assessment
- Employee input collected (surveys, safety committee, interviews)
- Corrective measures documented with responsible party and target date
- Follow-up verification that corrections were implemented
- Hazard records retained for a minimum of **5 years**

Recordkeeping Retention at a Glance

Record Type	Retain For	Available To
Training logs (dates, content, attendees)	1 year	Cal/OSHA, employees within 15 days

Violent incident log	5 years	Cal/OSHA, employees within 15 days
Hazard identification & correction records	5 years	Cal/OSHA, employees within 15 days
Investigation records	5 years	Cal/OSHA, employees within 15 days

What subilu Does Here

Subilu's training module tracks completion, logs Q&A session facilitators automatically, and enforces per-employee attestation. Retention timers are set automatically.

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Scale, Automation & the Subilu Roadmap

From California compliance today to a national multi-state strategy tomorrow.

SB 553 is the bellwether. At last count, **27 states** introduced workplace violence prevention bills in a single legislative session. The compliance infrastructure you build today should be architected to scale.

Beyond California: What to Watch

State / Region	Law / Bill	Key Difference from SB 553
New York	Retail Worker Safety Act	Sector-specific; focuses on retail; panic buttons required
Texas	HB / Healthcare Facilities WVP	Healthcare-sector focus; incident reporting to state agency
27 States	Pending general-industry bills	Most mirror CA SB 553 structure — plan + training + log
Federal (OSHA)	Proposed WPV rule	Would pre-empt state laws for interstate employers

Manual vs. Digital: The Risk Comparison

Compliance Task	Paper / Spreadsheet	subilu Platform
Annual WVPP review reminder	■ Calendar entry	✓ Automated 30-day alert
Incident log PI/PHI compliance	■ Manual review	✓ Guided redaction prompts
Training attendance records	■ Sign-in sheets, scan	✓ Digital attestation
Cal/OSHA audit response	■ Manual file search	✓ One-click audit packet

Join the Subilu Waitlist

We're gathering feedback from California SMB owners and operators to shape the product. Early-access members receive free onboarding support and locked-in founding pricing. Tell us what matters most to your compliance workflow.

■ subilu.com/waitlist · feedback@subilu.com