

Palermo Union Elementary School District

WORKPLACE VIOLENCE PREVENTION PLAN

Last Updated: August 2024

TABLE OF CONTENTS

PURPOSE AND AUTHORITY 3
RESPONSIBILITY 4
PROCEDURES AND IMPLEMENTATION..... 5
PLAN COMMUNICATION 5
RESPONDING TO REPORTS OF WORKPLACE VIOLENCE 5
EMPLOYEE COMPLIANCE 6
EMPLOYEE COMMUNICATION 7
EMPLOYER EVALUATION AND RESPONSE 8
EMPLOYEE TRAINING 9
RECORDKEEPING 9
HAZARD ASSESSMENTS..... 10
DEFINITIONS..... 11

PURPOSE AND AUTHORITY

California SB 553 requires California employers to establish, implement, and maintain an effective Workplace Violence Protection Plan (WVPP) at all times in all work areas.

The Palermo Union Elementary School District (PUESD) developed its workplace violence prevention plan to address and proactively mitigate the four types of workplace violence as defined by Labor Code (LC) Section 6401.9. The WVPP includes the following components:

1. Job titles or persons responsible for implementing and maintaining the plan.
2. Methods to ensure employees understand their respective roles, as provided in the plan.
3. Procedures for the employer to accept and respond to reports of workplace violence and to prohibit retaliation against an employee who makes such a report.
4. Procedures to ensure that supervisory and nonsupervisory employees comply with the plan.
5. Procedures for an employee to report a violent incident, threat, or other workplace violence concern to the employer or law enforcement without fear of reprisal. Procedures to communicate with the employee during and after the investigation.
6. Procedures to respond to actual or potential workplace violence emergencies, including, but not limited to, all of the following:
 - a. Methods to alert employees of workplace violence emergencies' presence, location, and nature.
 - b. Evacuation and sheltering protocols.
 - c. Training of employees in options-based approaches to emergencies.
7. Procedures to develop and provide employee training
8. Procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic inspections to identify vulnerabilities and work practices and employee reports and concerns. The evaluation and response team shall conduct inspections:
 - a. After the plan is implemented on July 1st, 2024
 - b. After each workplace violence incident
 - c. Whenever the employer is made aware of a new or previously unrecognized hazard.
9. Procedures to correct workplace violence hazards identified above promptly consistent with the IIPP, including:
 - a. Procedures for post-incident response and investigation.
 - b. Procedures to review the effectiveness of the plan and revise the plan, including:
 - i. Obtaining the active involvement of employees and authorized employee representatives in reviewing the plan.
10. A written log recording incidents of workplace violence, training, and hazards.

RESPONSIBILITY

Administrators

The Superintendent or their designee will have the following responsibilities:

1. Review and update the Workplace Violence Prevention Plan (WVPP).
2. Receive and respond to employee reports of workplace violence hazards.
3. Ensure employees receive annual training on the WVPP.
4. Complete the employee workplace violence hazard log.
5. Conduct ongoing workplace violence hazard inspections on PUESD facilities.
6. Evaluate any information received from the Assistant Superintendent of Human Resources.

The Human Resources Technician will have the following responsibilities:

1. Receive and evaluate all workplace violent incident reports.
2. Notify the Superintendent or their designee of any reports that are received.
3. Determine if the Superintendent or their designee needs to provide further evaluation, investigation, or support.
4. Maintain the workplace violent incident log.
5. Implement management strategies for workplace violence incidents.

Managers and Supervisors

All managers or supervisors employed by PUESD are responsible for implementing and maintaining the WVPP in their work areas, answering employees' questions and ensure that employees follow reporting procedures and this plan's provisions.

Employees

All employees will follow all WVPP directives, policies, and procedures and assist in maintain a safe work environment.

Employees should immediately report all workplace violence and hazards to their immediate supervisor and submit a report online using *Incident IQ (Help Desk)* to the Human Resources Technician. If there is an immediate life threat to any employee, employees should activate the 911 system before submitting any reports. Employees should submit reports without fear of reprisal.

Employees who are teleworking from a location of the employee's choice and not under the control of PUESD are not subject to this plan.

School Site Behavioral Threat Assessment Team

Multidisciplinary school site behavioral threat assessment teams can be activated to assess concerning or threatening behaviors for students at each school site. The Superintendent or their designee will assist schools with identifying concerning behaviors, assessments, and management strategies.

PROCEDURES AND IMPLEMENTATION

Involving employees in developing and implementing the WVPP is critical to the program's effectiveness. PUESD welcomes and encourages employees to participate in this plan's initial implementation and ongoing development. PUESD will utilize the following procedures to involve employees in the development and implementation of this plan:

The Superintendent will consult with all bargaining units and employee groups in regards to the development of the plan, logging procedures, employee training, the reporting process, the annual review and updates to the plan.

All employees can continue participating in the WVPP by participating in the annual training and reporting newly identified workplace violence hazards.

PLAN COMMUNICATION

PUESD recognizes the importance of all employees understanding all aspects of this plan and how to report incidents of workplace violence. PUESD encourages employees to report workplace violence or workplace violence hazards without fear of reprisal.

PUESD will communicate the WVPP by using the following procedures:

1. Provide an annual interactive training session for all employees.
2. Provide a WVPP reporting form using Incident IQ (Help Des) and hard copies of the report form in all offices, so all employees can report workplace violence incidents and hazards.
3. Every reporting employee will receive direct contact from a member of the investigation team after a report is submitted.
4. Employees will receive updates on any newly identified workplace violence hazards and steps taken to mitigate the danger.

RESPONDING TO REPORTS OF WORKPLACE VIOLENCE

Employees should call 9-1-1 if the threat or act of violence is imminent.

If the employee is not in imminent danger, the employee will submit a report by completing the workplace violence reporting form. If the employee's supervisor is not the perpetrator, the employee should make a verbal report to their direct supervisor and submit the workplace violence reporting form.

The following additional practices will ensure compliance and transparency with the workplace violence prevention program reporting procedures:

- Reports will go directly to the Human Resources Technician.
- All employees will receive training to know, understand, and report within the definitions of workplace violence and workplace violence hazards.
- If a supervisor receives a verbal report from an employee, he or she will assist or direct the employee to complete a WVPP report.
- Cross-reports will be submitted to the police or other authorities if required.
- Reports are kept confidential and will only be accessed by the investigation team as needed to assist in the investigation.
- The investigation team will investigate every report. The employee who made the report will be notified regarding the outcome of the investigation and corrective actions/steps taken.
- The investigation team may contact employees to gather additional information (e.g., clarify statements, document evidence, or ask follow-up questions).
- All reports of workplace violence will be documented in the "Violent Incident Log" for recordkeeping and reporting purposes.

Active Workplace Violence Emergencies

Employees could be alerted to emergencies and workplace violence in multiple different ways. Employees may be alerted by an intercom system, emails, text messages, phone calls, Catapult EMS, Butte County CodeRED, and other public announcement systems.

Employees should reference the PUESD Quick Action Guide for information on Evacuation, Reunification, Shelter-in-Place, Stay, Secure, and Lockdown. As part of the WVPP employee training, employees will receive run, hide, and fight training.

Employees must understand that workplace violence may have no warning or announcements before the violent incident occurs. Employees who observe an emergency should notify 9-1-1 and other employees of the nature and location of the emergency.

EMPLOYEE COMPLIANCE

While the Superintendent or their designee oversees the development, implementation, and maintenance of the WVPP, all employees are responsible for adhering to their roles, responsibilities, and training provided under this plan. Supervisors and managers will use the following procedures to ensure employees comply with the WVPP:

- Ensure that employees take/attend the training(s) and refresher training(s) assigned to them.
- Monitor employee adherence to topics and concepts covered in the training.
- Follow the established corrective action process if an employee or supervisor does not follow elements of this plan.

Corrective Action

Site Administrators, Directors, and Managers will use all disciplinary methods available to them to ensure that employees follow established safety policies and procedures. An employee who fails to adhere to the procedures and practices of this plan shall be subject to the following corrective actions:

1. Retraining
2. Verbal Counseling
3. Performance evaluations
4. Written warnings
5. Other forms of disciplinary action

EMPLOYEE COMMUNICATION

Employees should use the workplace violence reporting form located online through *Incident IQ (Help Desk)* to report all workplace violence-related incidents, threats, and concerns to the Human Resources Technician. If the threat or act of violence is imminent, employees should contact emergency services directly by calling 9-1-1 before completing the report form.

When making a report of workplace violence using the workplace violence reporting form on Incident IQ (Help Desk), employees will provide the following information:

1. Your name, phone number, job title, and department
2. Circumstances at the time of the incident, including but not limited to the following:
 - a. Were you completing your regular job duties?
 - b. Were you working in a poorly lit area?
 - c. Were you rushed?
 - d. Were you working at a low staffing level?
 - e. Were you isolated or alone?
 - f. Were you unable to get help or assistance?
 - g. Were you working in a community setting?
 - h. Were you working in an unfamiliar or new location?
3. Person of Concern information
 - a. Name, contact information, physical description
4. Date and time the incident occurred
5. Incident information
 - a. Incident location
 - b. Detailed description of the incident
 - c. Were there any witnesses?
 - d. Was law enforcement contacted?
 - e. Was medical attention required?
 - f. Was your immediate supervisor notified?

EMPLOYER EVALUATION AND RESPONSE

When responding to a workplace violence report, the Human Resources Technician will receive the report and notify the Superintendent or their designee. The Human Resources Technician and the Superintendent or their designee will complete the following:

1. Determine if the report meets the definition of workplace violence.
2. Determine if any additional help is needed from the Superintendent or their designee.
3. Determine any steps to protect the reporting employee or any other employee against an immediate threat of violence.
4. Review previous incidents.
5. Gather all relevant information (interview employees, visit the location, document evidence, ask follow-up questions), and capture the following information:
 - a. Was security or law enforcement contacted?
 - i. If so, what was their response (please explain):
 - ii. Actions taken to protect employees from a continuing threat or any other hazards resulting from the incident (please explain)
 - b. The person who is completing the employer's response/log:
 - i. Name
 - ii. Title
 - iii. Date
6. Evaluate the findings to identify the root cause.
7. Define corrective actions/steps to be taken to address each cause.
8. Coordinate with the necessary departments/staff to implement corrective actions.
9. Communicate your findings and corrective actions back to the reporting employee.
10. Monitor the effectiveness of corrective actions taken.
11. Document the incident and all correlating information in the "Violent Incident Log" for recordkeeping and reporting purposes.
 - a. The Violent Incident Log shall omit the following information of any person involved in the incident:
 - i. Name
 - ii. Address
 - iii. Electronic mail address
 - iv. Telephone number
 - v. Social security number
 - vi. Other information that, alone or in combination with other publicly available information, reveals the person's identity.
 - b. The Violent Incident Log shall include the following:
 - i. The date, time, and location of the incident
 - ii. Workplace violence type
 - iii. Detailed description of the incident
 - iv. Perpetrator classification to employee
 - v. Classification of circumstances at the time of the incident

- vi. Classification of where the incident occurred
- vii. Type of incident
- viii. Consequences of the incident
 - 1. If law enforcement was contacted
 - 2. Actions taken to protect the employee and correct hazards
- ix. Name and job title of the person who completed the log
- x. Date the log entry was completed.

EMPLOYEE TRAINING

The Palermo Union Elementary School District will provide all employees with annual training that includes, but is not limited to, all of the following:

1. The definitions and requirements of SB 553.
2. How to report workplace violence incidents to PUESD using Incident IQ (Help Desk) and law enforcement without fear of reprisal.
3. How to report unrecognized workplace violence hazards.
4. Types of logs and how to obtain a copy of each log.
5. Responding to emergencies.
6. Review of the PUESD Quick Action Guide.
7. Respond to violence with Run/Hide/Fight.
8. How to obtain a copy of the plan at no cost and how to participate in its continuous development.
9. Ask questions and receive answers from someone knowledgeable about the employer's plan.
10. Employee participation in the continuous development of the plan.

PUESD will provide additional training when a new or previously unrecognized workplace violence hazard is identified or necessitates changes to the plan. The extra training may be limited to addressing the new workplace violence hazard or modifications to the plan.

RECORDKEEPING

Records of workplace violence hazard identification, evaluation, and correction will be created and maintained for at least five years.

Training records will be created and maintained for at least one year and include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions.

Violent incident logs will be maintained for at least five years.

Records of workplace violence incident investigations will be maintained for at least five years. These records shall not contain "medical information," as defined in subdivision (j) of Section 56.05 of the Civil Code.

All records required above will be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request.

Vulnerability assessment and inspection reports are subject to California Government Code section 7929.200.

The Superintendent or their designee will ensure that all relevant records are completed, maintained, and made available upon request as required by this program and Cal/OSHA. A safe and healthy workplace is the goal of everyone at the Palermo Union Elementary School District, with responsibility shared by management and staff alike.

HAZARD ASSESSMENTS

PUESD will conduct periodic inspections for workplace hazards and security. A multidisciplinary evaluation and response team could include employees from maintenance and operations, information technology, human resources, and the emergency preparedness department. The team will conduct annual plan reviews, post-incident responses, evaluations of new hazards, and periodic inspections.

Any employee who identifies a workplace violence hazard is encouraged to report it using the PUESD workplace hazard reporting form that is available on all district webpages and in all site offices.

Hazards located during a workplace violence inspection will be documented and corrected promptly.

Hazard assessments will be performed:

- Annually
- When a new or previously unidentified violence hazard is recognized
- Post-workplace violence incident
- New PUESD facilities or significant changes to existing PUESD facilities

Inspections will be performed through the lens of the four types of violence outlined in SB-553.

Type 1 Violence Assessments will assess anyone with no legitimate business at the worksite and include violent acts by anyone who enters the workplace or approaches workers intending to commit a crime. The assessment will consist of:

- Natural surveillance for employees to observe the exterior of the facility.
- Exterior physical measures and points of entry into the buildings.

- Employee response to a crime in progress.
- Procedures for employees to interact and report unknown persons on the properties of PUESD.

Type 2 Violence Assessments will assess violence directed at employees by customers, clients, patients, students, inmates, or visitors. The assessment will include:

- Access within the interior of the workplace.
- Physical barriers, locks, security systems, and exit/entry points.
- Adhere to visitor management policies and monitor visitors in the workplace.
- Employee evacuation routes and relocation areas.
- Warning and communication systems.
- Employees' ability to handle hostile persons.

Type 3 Violence Assessments will assess violence against an employee by a present or former employee, supervisor, or manager. Type 4 violence inspection will assess violence directed at an employee's workplace by a person who does not work there but has or is known to have had a personal relationship with an employee. The assessment will include:

- Warning signs of potential workplace violence
- Visitor management for people visiting with known relationships with employees.
- Communication with employees, supervisors, and managers.
- Facility access to former employees.
- Review of reports received from employees and facilities.
- Employee termination and disciplinary action procedures.

Type 4 Violence Assessments will assess violence directed at an employee's workplace by a person who does not work there but has or is known to have had a personal relationship with an employee. The assessment will include:

- Warning signs of potential workplace violence
- Visitor management for people visiting with known relationships with employees.
- Communication with employees, supervisors, and managers.
- Facility access to former employees.
- Review of reports received from employees and facilities.
- Employee termination and disciplinary action procedures.

DEFINITIONS

For this plan, the following definitions apply:

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

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.

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

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

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 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 is reasonably perceived to convey an intent, to cause physical harm or instill fear of physical harm in someone, and that serves no legitimate purpose.

Workplace violence - Any act of violence or threat of violence that occurs in a place of employment excluding lawful acts of self-defense or defense of others. This includes, but is not limited to the following:

- The threat or use of physical force against an employee resulting in, or having 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 everyday objects as weapons, regardless of whether the employee sustains an injury.

Type 1 workplace violence - workplace violence committed by a person with no legitimate business at the worksite, including violent acts by anyone entering the workplace or approaching workers with the intent to commit a crime.

Type 2 workplace violence - workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

Type 3 workplace violence - workplace violence against an employee by a present or former employee, supervisor, or manager.

Type 4 workplace 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.

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