PALO ALTO
UNIFIED SCHOOL DISTRICT



WORKPLACE VIOLENCE PREVENTION PLAN

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DEFINITIONS

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

Engineering controls - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee 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 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.

Workplace violence - Any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- 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.

- 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.

DEFINITIONS CONTINUED

The following four workplace violence types:

Type 1 violence - 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 employees with the intent to commit a crime.

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

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

Type 4 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.

Workplace violence does not include lawful acts of self-defense or defense of others.

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

RESPONSIBILITY

Workplace Violence Prevention Plan Administrators and their designees have the authority and responsibility for implementing the provisions of this plan for Palo Alto Unified School District. Designees shall include all Administrators, Directors, Managers, Supervisors and Foremen.

EMPLOYEE ACTIVE INVOLVEMENT

Palo Alto Unified School District ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

Workplace Violence Prevention Administrators (WVPPA's) will work with School Safety and Resilience Team members, and authorized employee representatives to participate in:

- Identifying, evaluating, and determining corrective measures to prevent workplace violence. Workplace Violence Prevention Administrators (WVPPA's) will have quarterly safety meetings with employees and their representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.

- Make recommendations for designing and implementing training.

- Reporting and investigating workplace violence incidents.

Workplace Violence Prevention Administrators (WVPPA's) and their designees will ensure that workplace violence prevention practices and procedures within this written plan are clearly communicated to employees. Workplace violence prevention practices and procedures are to be enforced fairly and uniformly.

All employees will follow workplace violence prevention plan directives and procedures, and assist in maintaining a safe work environment.

The plan is a living document and subject to change. It shall be in effect at all times and in all work areas.

EMPLOYEE COMPLIANCE

Our system to ensure that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

- Training employees, supervisors, and managers in the provisions of Palo Alto Unified School District Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace by memos/emails or certificate of recognition from the District.
- Discipline employees for failure to comply with the WVPP. Please refer to existing discipline processes established by Human Resources.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employers, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns.
- Posted or distributed workplace violence prevention information.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.

Examples:

§ Employees can anonymously report a violent incident, threat, of other violence concerns.

§ Panic Alert buttons and District emergency contacts.

- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees' concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken in line with District policy.

COORDINATION WITH OTHER EMPLOYERS

Contract employers will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multi employer worksite, contract employers are to ensure that if its employees experience workplace violence incident that contract employers will record the information in a violent incident log and shall also provide a copy of that log to controlling employer.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Palo Alto Unified School District will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported directly to a WVPP administrator or designee. Our WVPP administrators are currently the Deputy Superintendent/Chief of Staff and the Safety, Security and Disaster Preparedness Manager.

- Employees can use the Let's Talk platform or the PAUSD Safety Concern reporting form provided over the PAUSD Prepared site found in every employee's ID Portal under Safety, Security and Disaster Prep. Employees may also report workplace violence hazards to a supervisor or a union representative.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively in-line with District policy.

EMERGENCY RESPONSE PROCEDURES

Palo Alto Unified School District has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following.

Example:

Alarm systems, panic alerts, radios, PA announcements, SMS Messages, VOIP calls and emails will be used to alert supervisors, office staff, employees, students and families of emergencies.

- Palo Alto Unified School District has evacuation and sheltering plans in place.

- If an employee is experiencing an emergency, they are expected to dial 9-1-1. They are to then follow up with their immediate supervisor and then WVPP Administrator when necessary.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following procedures are established and required to be conducted by Palo Alto Unified School District to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.

- Review all submitted/reported concerns of potential hazards. This is to include all submitted reports using Let's Talk and or the PAUSD Prepared Safety Concern form.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION CONTINUED

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the Safety, Security and Disaster Preparedness Manager and/or third party contract services:

Example

Specific Person Name/Job Title
Area/Department/Specific location

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to intruders/robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Adequacy of workplace security systems, such as door locks, badge readers, physical barriers.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION CONTINUED

Inspections for workplace violence hazards include assessing- continued:

- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., radios, alarms or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes and anything impeding egress.
- How well our establishment's management and employees communicate with each other.
- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. Palo Alto Unified School District will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s) , all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.

- All corrective actions taken will be documented and dated on the appropriate forms.

- Corrective measures for workplace violence hazards will be specific to a given work area.

Examples:

- Make the workplace unattractive to intruders/robbers by:

- Improve lighting around and at the workplace.

- Post of signs notifying the public that cameras are monitoring the facility.

- Utilize surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.

- Hire security guards or campus supervisors, and have them patrol the workplace interior and perimeter.

- Install security surveillance cameras in and around the workplace.

WORKPLACE VIOLENCE HAZARD CORRECTION

Examples Continued:

- Provide workplace violence systems, such as door locks, physical barriers, and emergency alarms.
- Monitor the adequacy of workplace violence systems
- Provide emergency telephone numbers for law enforcement, fire, and medical services
- Control, access to, and freedom of movement within, the workplace by non-employees, include recently discharged employees or persons with whom one of our employees is having a dispute.
- Install effective systems to warn others of a violence danger or to summon assistance, e.g., alarms or panic buttons.
- Ensure employees have access to a telephone with an outside line. Provide employee training/re-training(refreshers) on the WVPP, which could include but not limited to the following:

§ Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.

§ Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.

WORKPLACE VIOLENCE HAZARD CORRECTION

Examples Continued:

§ Review communication protocols.

§ Procedures for reporting suspicious persons, activities, and packages.

§ Provide/review employee, supervisor, and management training on emergency action procedures.

Ensure adequate employee escape routes.

- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
- Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.
- Establish a policy for prohibited practices such as a no-weapons policy.
- Provide procedures for a "buddy" system for specified emergency events.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or their designee will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensuring corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, such as: See attached Violent Incident Log

1. The date, time, and location of the incident.
2. The workplace violence type or types involved in the incident.
3. A detailed description of the incident.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION CONTINUED

4. A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.

5. A classification of circumstances at the time of the incident, including, but not limited to job duties and workplace conditions.

6. A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.

7. The type of incident, including, but not limited to, whether it involved any of the following:

§ Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.

§ Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.

§ Threat of physical force or threat of the use of a weapon or other object.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION CONTINUED

§ Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.

§ Other.

8. Consequences of the incident, including, but not limited to:

§ Whether security or law enforcement was contacted and their response.

§ Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.

9. Reviewing all previous incidents.

Example:

Support and resources, such as counseling services, are provided to affected employees. These resources could include referrals to counseling services, information about employee assistance programs, and time off work if necessary.

Ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- When the WVPP is first established.
- Annually to ensure all employees understand and comply with the plan.
- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Palo Alto Unified School District will provide its employees with training and instruction on the definitions found on page 4 of this plan and the requirements listed below:

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Potential workplace violence hazards specific to the employees' jobs, the corrective measures Palo Alto Unified has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs if appropriate.
- Opportunities Palo Alto Unified School District has for interactive questions and answers with a person knowledgeable about the plan.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Palo Alto Unified School District ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished, for example:

- The Workplace Violence Prevention Plan will be posted on the District Website under Safety and Security.

- Whenever an employee or designated representative requests a copy of the written WVPP, we will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.

- We will provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the written WVPP. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or co-employees.

RECORDKEEPING

Palo Alto Unified School District will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.

- Create and maintain training records for a minimum of one (1) year and include the following:

1. Training dates.

2. Contents or a summary of the training sessions if applicable.

3. Names and qualifications of persons conducting the training if applicable.

4. Names and job titles of all persons attending the training sessions.

- Maintain violent incident logs for minimum of five (5) years.

- Maintain records of workplace violence incident investigations for a minimum of five (5) years.

1. The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.

- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by LC section 6401.9(f), shall be made available to Cal/OSHA upon request for examination and copying.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

REVIEW AND REVISION OF THE WVPP

The Palo Alto Unified School District WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

- Review of Palo Alto Unified's WVPP should include, but is not limited to:

1. Review of incident investigations and the violent incident log.
2. Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).

- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. These revisions could involve changes to procedures, updates to contact information, and additions to training materials.

EMPLOYER REPORTING RESPONSIBILITIES

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, Palo Alto Unified School District will immediately report to Cal/OSHA any serious injury or illness (as defined by CCR, Title 8, Section 330(h)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

VIOLENT INCIDENT LOG

This log must be used for every workplace violence incident that occurs in the workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- Investigation findings.

All information that personally identifies the individual(s) involve will be omitted from this log, such as:

- Names
- Addresses – physical and electronic
- Telephone numbers
- Social security number

Enter the date the incident occurred (Day, Month, Year)

Enter the time (or approximate time) that the incident occurred (a.m./p.m.)

VIOLENT INCIDENT LOG CONTINUED

This log must be used for every workplace violence incident that occurs in the workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- Investigation findings.

All information that personally identifies the individual(s) involve will be omitted from this log, such as:

- Names
- Addresses – physical and electronic
- Telephone numbers
- Social security number

Enter the date the incident occurred (Day, Month, Year)

Enter the time (or approximate time) that the incident occurred (a.m./p.m.)

VIOLENT INCIDENT LOG CONTINUED

Location(s) of Incident: _____

Workplace Violence Type (circle which type(s) (Type 1, 2, 3, 4)

Enter location(s) where the incident occurred: _____
_____

Check which of the following describes the type(s) of incident, and explain in detail:

Note: It's important to understand that "Workplace Violence Type" and "Type of Incident" have separate requirements. For this part of the log, "Type of Incident" specifically refers to the nature or characteristics of the incident being logged. It does not refer to the type of workplace violence.

- Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.

- Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.

- Threat of physical force or threat of the use of a weapon or other object.

- Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.

- Animal attack.

- Other (Explain) _____

VIOLENT INCIDENT LOG CONTINUED

Explain: Provide a detailed description of the incident and any additional information on the violence incident type and what it included. Continue on separate sheet of paper if necessary.

VIOLENT INCIDENT LOG CONTINUED

Workplace violence committed by: For confidentiality, only include the classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.

Circumstances at the time of the incident: write/type what was happening at the time of the incident, including, but not limited to, whether the employee was working in a community setting, or working in an unfamiliar or new location.

Where the incident occurred: Where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.

Consequences of the incident, including, but not limited to:

- Whether security or law enforcement was contacted and their response.
- Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.

Include information on what the consequences of the incident were.

_____

_____

_____

1. Were there any injuries? Yes or No. Please explain on the following page:

VIOLENT INCIDENT LOG CONTINUED

Indicate here if there were any injuries, if so, provide description of the injuries

_____

_____

Were emergency medical responders other than law enforcement contacted, such as a Fire Department, Paramedics, On-site First-aid certified personnel? Yes or No. If yes, explain below:

_____

_____

Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.

_____

_____

A copy of this violent incident log needs to be provided to the employer. Indicate when it was provided and to whom.

_____

_____

This violent incident log was completed by (Name of person completing this log, Job Title of person completing this log, Date this log was completed)

_____

_____

Signature of person completing this log _____

Date of completion _____