

Workplace Violence Prevention Plan

Workplace Violence Prevention Plan for Oxnard Union High School District.

1. Safety Policy

- a. It is the policy of our Local Educational Agency (LEA) to provide a safe and healthful workplace. Every employee is responsible for the safety of himself/herself as well as others in the workplace. To achieve our goal of maintaining a safe workplace, everyone must be mindful of safety at all times. In compliance with California law, and to promote the concept of a safe workplace, the LEA maintains this Workplace Violence Prevention Plan (WVPP).

2. Definitions

- a. Emergency - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons
- b. 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.
- c. LEA Office Site – Administrative buildings and offices, education services buildings and offices, operations buildings and offices, maintenance facilities, transportation facilities, other meeting locations.
- d. 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.
- e. Threat assessment Team - a group of officials that convene to identify, evaluate, and address threats or potential threats to school security.
- f. 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.
- g. Workplace violence includes, but is not limited to, the following:
 - 1) 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.

- 2) 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.
 - 3) The following four workplace violence types:
 - a) 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.
 - b) Type 2 violence - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 - c) Type 3 violence - Workplace violence against an employee by a present or former employee, supervisor, or manager.
 - d) 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.
 - 4) Workplace violence does not include lawful acts of self-defense or defense of others
 - h. Work practice controls - Procedures and rules which are used to effectively reduce workplace violence hazards.
3. Responsibility
- a. Assistant Superintendent Human Resources is the WVPP administrator, has the authority and the responsibility for implementing and maintaining this Workplace Violence Prevention Plan
 - b. The responsibilities of our WPPP Administrator(s) include:
 - 1) Preparing and updating, with employee involvement, our LEA's WVPP,
 - a) Updating meetings will occur:
 - (1) Annually
 - 2) Implementing the provisions in our WVPP,
 - 3) Making sure each site has a copy of our WVPP,
 - 4) Making sure hazards, injuries and threats and incidents of workplace violence in each site are routinely investigated.
 - 5) Taking action to control or minimize identified hazards. Refer to Section 10.
 - 6) Establishing procedures for employee reporting of workplace violence hazards. Refer to Section 4.
 - c. Principals, managers, and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.
 - d. A copy of this WVPP is available from the LEA website on the Human Resources page.
 - e. As the designee of the Governing Board, the Superintendent approves the final WVPP and any major changes.
4. Employee Involvement
- a. Threat assessment team or safety committee review incidents of threats of violence or threatening behavior by students (current and former), parents, school employees, or other individuals.
 - 1) employees and authorized employee representatives

- b. The WVPP administrator will work with and allow the threat assessment team and/or safety committee to participate in:
 - 1) Preparing and updating our LEA's WVPP,
 - 2) Identifying, evaluating, and determining corrective measures to prevent workplace violence.
 - a) Periodic and scheduled meetings to discuss the WVPP:
 - b) Anonymous reporting.
 - 3) Reporting workplace violence incidents and potential workplace violence incidents.
 - c. Employees are encouraged to submit workplace violence suggestions to the WVPP administrator, threat assessment team, and/or safety committee.
 - d. Employees are encouraged to report domestic disputes that may become violent or may bring violence to the work site to Human Resources.
 - e. The WVPP administrator will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
 - f. All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.
 - g. The WVPP shall be always in effect and in all work areas and be specific to the hazards and corrective measures for each work area and operation.
5. Employee Compliance
- a. All employees, including managers and supervisors, are responsible for complying with the provisions of this WVPP.
 - b. Our system of ensuring that all employees comply with these practices include one or more of the following practices:
 - 1) Informing employees of the provisions of our WVPP.
 - 2) Evaluating the safety performance of all employees.
 - 3) Disciplining employees for failure to comply with safe and healthful work practices.
 - a) Discipline will follow Board Policy and Administrative Regulation and applicable collective bargaining agreements.
6. Communication with Employees
- a. All managers and supervisors are responsible for communicating with all employees about occupational safety and health in a form readily understandable by all employees.
 - b. Our communication system encourages all employees to inform their managers and supervisors about workplace hazards without fear of reprisal.
 - c. Our communication system includes one or more of the following:
 - 1) Training programs
 - 2) Regularly scheduled safety meetings that address security issues and potential workplace violence hazards
 - 3) Posted or distributed safety information

- 4) A system for employees to anonymously inform management about workplace hazards
- 5) 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

7. Coordination with Other Employers

- a. Our LEA 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.
 - 1) All employees of contractors or vendors will be required to be trained in workplace violence prevention.
 - 2) Workplace violence incidents involving any employee will be reported, recorded, and investigated.
 - 3) Contractors or vendors will ensure that if their employees experience workplace violence incident that LEA will record the information in a violent incident log and shall also provide a copy of that log to the contractor or vendor.

8. Workplace Violence Incident Reporting Procedure

- a. All threats or acts of workplace violence are reported as follows:
 - 1) Using the We Tip on-line reporting application, or
 - 2) Completing a written form found on the LEA website and submitting the report to an employee's supervisor or manager, who will inform the WVPP administrator.
 - a) The WVPP administrator or designee will enter written reports into the We Tip on-line reporting application.
- b. Board Policy and Administrative Regulation prohibit any retaliation for reporting of threat of violence or workplace violence incidents.

9. Workplace Violence Hazard Identification and Evaluation

- a. Periodic inspections to identify and evaluate hazards in our schools' sites will be performed by one or more of the following individuals:
 - 1) School-site safety coordinators at their school sites,
 - 2) Managers and supervisors, or designee, of their respective departments,
 - 3) Threat assessment team or safety committee.
 - 4) Hired security consultants

b. Periodic inspections are performed according to the following schedule:

Area	Inspection Frequency
Site perimeter and grounds	Quarterly
Administration and Offices	Quarterly
Athletic Facilities	Quarterly
Performing Arts Centers	Quarterly
Classrooms	Quarterly
Food Services / Child Nutrition	Quarterly
Maintenance	Quarterly
Transportation	Quarterly
Warehouse	Quarterly

c. Periodic inspections to identify and evaluate workplace hazards shall be performed by a competent observer in the areas of our LEA listed above.

10. Workplace Violence Hazard Correction

a. Workplace violence hazards will be evaluated and corrected in a timely manner

b. Imminent hazards

- 1) If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), employees will follow Emergency Response Procedures outlined in Section 11.

c. Engineering Controls:

- 1) 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.
- 2) Crime prevention through environmental design
 - a) Surveillance
 - (1) Windows overlooking entrances, sidewalks and parking lots
 - (2) Window coverings remain open until a workplace violence incident dictates closure.
 - (3) Well-lit pathways, stairs, entrances/exits, parking areas, storage areas, dumpster and recycling areas.
 - b) Access Control
 - (1) Single, clearly identifiable point of entry during business hours and school hours.
 - (2) Substantial, high, fencing, with locking gates.
 - c) Definition of space

- (1) Using buildings, fences, pavement, signs, lighting and landscape to express ownership and define public, semi-public and private space

d) Activity Support

- (1) Signage directing visitors to points of entry .
- (2) Signage indicating prohibited practices, including prohibition of weapons.

- 3) Well-lit pathways, stairs, entrances/exits, parking areas, storage areas, dumpster and recycling areas
- 4) School sites will have substantial, high, fencing, with locked gates during school hours.
- 5) Single, clearly identifiable point of entry during business hours and school hours.
- 6) Locks on doors.
- 7) Electronic access controls to employee occupied areas
- 8) Weapon detectors (installed or handheld) at large events such as graduations and athletic events.
- 9) Enclosed workstations with shatter-resistant glass.
- 10) Deep service counters.
- 11) Furniture affixed to the floor.
- 12) Security cameras and video recording.

d. Work Practice Controls:

- 1) Procedures, rules and staffing which are used to effectively reduce workplace violence hazards.
- 2) During office hours at LEA office sites, visitors will use designated points of entry.
- 3) During school hours at school sites, all visitors must register with the principal or designee in the school office.
- 4) During student drop off and pick up times, open gates will be monitored by school staff.
- 5) Dedicated security personnel at large events such as graduations and athletic events.
- 6) Employees are encouraged to report domestic disputes that may be violent to Human Resources.
- 7) Temporary restraining orders.
- 8) Nonviolent Crisis Prevention and Intervention (NCPI) training to prevent and de-escalate medium to high-risk student behavior.
- 9) Notifying parents regarding proper home gun storage.

e. Personal protective equipment (PPE):

- 1) Large bean bags or blocking pads will be used to protect against student hits and kicks.
- 2) Kevlar gloves and sleeves will be used to protect against student bites.

f. All corrective actions taken will be documented and dated.

11. Emergency Response Procedures

a. Threat of Violence

- 1) Imminent threat - Call **911** in any emergency

- 2) General threat or threatening behavior - WVPP Administrator and threat assessment team or safety committee will work with law enforcement to determine the extent and severity of the threat.
- b. Violence on a LEA Office Site or school site
 - 1) Call **911** in any emergency
 - 2) Communication/warning
 - a) The warning signal at the school for workplace violence involving weapons shall be:
 - (1) “Our school/office/site is in a Lockdown – this is not a drill.”
 - b) Additional information
 - (1) Example: “Active shooter / dangerous person on campus, take immediate action.”
 - c) Cancellation:
 - (1) “The Lockdown is clear, all clear.”
- 3) Actions
 - a) In the event of a dangerous person on campus or an LEA office site, employees and students will do the following:
 - (1) Utilize the “Three Outs”:
 - Lock Out
 - Lock the dangerous person out of the building or interior rooms
 - Employees will lock themselves and others away from the assailant to avoid detection.
 - Layer to further protect the room
 - (a) Lock and bridge or stack/pile furniture in front of doors that open in, or
 - (b) Lock and belay or tie doors that open out.
 - Get Out
 - If the dangerous person is in an immediate area with employees and/or students, employees will Get Out, attempt to escape, for themselves and others.
 - Get out can lead to Lock Out.
 - If in an open area, employees and others will move to cover or other safe area.
 - Take Out
 - Take out the assailant when there are no other options
 - (a) If the dangerous person is close to employees and/or students and escaping is not an option, employees and/or students should FIGHT
 - (b) If Lock Out fails.
 - Employees and/or students will improvise weapons from materials found in the office or classroom including, but not limited to:
 - (a) Chairs, books, fire extinguisher, scissors, etc.
 - (2) The best “out” action is determined by the circumstances.

(3) More than one “out” action can be utilized in a single workplace violence incident.

4) Other Actions

- a) Normal work or teaching activities are to be stopped.
- b) Employees and students will keep quiet and away from doors and windows, assemble along the safe wall.
 - (1) Employees and students will maintain a calm environment.
 - (2) Teachers will take roll and prepare a list of missing students.
- c) Employees and students will silence all mobile telephones, keep the office or classroom computer turned on.
- d) Employees will continue to check e-mail, text messages or other LEA-provided application for updates.
- e) Teachers will call or e-mail attendance information to the school office, after the threat is contained.
- f) The site administrator or school principal will announce over the intercom when the lockdown is ended

c. Threat of Violence or Violence in the community surrounding an LEA Office Site or school site.

1) Shelter in place

2) Warning

- a) The warning signal at a LEA Office Site or school site for Action “Shelter in Place” shall be:
 - (1) “Our Site/School is in a Shelter in Place – this is not a drill.” Or
 - (2) “Shelter in Place, Shelter in Place, Shelter in Place.”
- b) Additional information:
 - (1) Example: “Police Activity near campus, take immediate action.” Or
 - (2) Example: “Shots fired at the park.”
- c) Cancellation
 - (1) “The Shelter in Place has been canceled, the campus is safe.” Or
 - (2) “The Shelter in Place is Clear, all clear.”

3) Actions for Shelter in Place

- a) All applicable procedures from lockdown
- b) Exception: Employees may continue working inside locked rooms or offices, teachers may continue teaching inside locked classrooms, and students may remain in their seats.

d. Once the Workplace Violence emergency has ended, it will be recorded as outlined in Sections 8 and 12.b.

12. Procedures for Post-Incident Response and Investigation

- a. After a workplace incident, the WVPP administrator or their designee and local law enforcement will implement the following post-incident procedures:
 - 1) Visit the scene of an incident as soon as safe and practicable

- 2) Interview involved parties, such as employees, witnesses, law enforcement that responded, and/or security personnel.
 - 3) Review security footage of existing security cameras if applicable.
 - 4) Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
 - 5) Determine the cause of the incident.
 - 6) Take corrective action to prevent similar incidents from occurring, as outlined in Section 9.
 - 7) Record the findings and ensure corrective actions are taken.
 - 8) Obtain any reports completed by law enforcement.
- b. Post-Incident Response and Investigation will be documented.
- 1) Using the We Tip on-line reporting application, or
 - 2) Completing a written form found on the LEA website and submitting the report to an employee's supervisor or manager, who will inform the WVPP administrator.
- c. No personal identifying information is recorded or documented in the written investigation report.

13. Training and Instruction

- a. All employees, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices. Training and instruction is provided:
- 1) When the Workplace Violence Prevention Plan was first established
 - 2) To all new employees.
 - 3) Whenever the LEA is made aware of a new or previously unrecognized hazard.
- b. Training will consist of:

Training Topic	Target Audience	Frequency
Workplace Violence Prevention Plan (Vector Solutions)	All Employees	When the Plan was first established. Refresher every three years.
Workplace Violence (EDU) (Vector Solutions)	All employees	Annual
PREVAIL! (Vector Solutions)	All employees	Every 3 years
Body Language Indicators of Concealed Armed Persons (Vector Solutions)	All employees	Every 3 years
School Violence and Weapons (EDU) (Vector Solutions)	All employees	Every 3 years

Training Topic	Target Audience	Frequency
Anger, Violence, and Conflict in the Workplace (Vector Solutions)	All employees	Every 2 years
Nonviolent Crisis Prevention and Intervention	Campus Supervisors	Biannual
Campus Supervisor (SALUS)	Campus Supervisors	Annual

c. All training will be documented.

14. Employee Access to the Written Workplace Violence Prevention Plan

- a. Our employees, or their designated representatives, have the right to receive upon request and without cost, for examination and copying within five (5) business days of a request a copy of the Workplace Violence Prevention Plan.
- b. Access is provided in one of the following manners:
 - 1) A printed copy of the WVPP will be provided free of charge.
 - a) In no event later than five (5) business days after the request for access is received
 - 2) Provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version.
- c. Our LEA will communicate the right and procedure to access the Workplace Violence Prevention Plan to all employees:
 - 1) A link to the WVPP listed in the annual notifications,
 - 2) New hire orientation training
 - 3) Information in the employee handbook regarding access to the WVPP.
 - 4) Designated area on the website easily identifiable for accessing the WVPP.
- d. Any copy provided to an employee, or their designated representative will not include any of the records of the steps taken to implement and maintain the written Workplace Violence Prevention Plan.
- e. A recognized or certified collective bargaining agent will be treated automatically as a designated representative for the purpose of access to the LEAs WVPP.
- f. Any other designated representatives must have written authorization from the employee including the following information:
 - 1) The name and signature of the employee authorizing the designated representative,
 - 2) The date of the request,
 - 3) The name of the designated representative,
 - 4) The date upon which the written authorization will expire (if less than 1 year).
- g. California public records act charges may apply for other designated representatives for hard copies.

15. Recordkeeping

- a. Oxnard Union High School District will:

- 1) Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- 2) Create and maintain training records for a minimum of one (1) year or when the training is repeated, whichever is longer, and include the following:
 - a) Training dates,
 - b) Contents or a summary of the training sessions,
 - c) Names and qualifications of persons conducting the training or on-line platform providing the training,
 - d) Names and identifiers of all employees attending the training sessions.
- 3) Maintain violent incident logs for minimum of five (5) years.
- 4) Maintain records of workplace violence incident investigations for a minimum of five (5) years.
 - a) These records shall not contain medical information.
- b. All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations shall be made available to the California Division of Occupational Safety and Health, also known as Cal/OSHA, upon request for examination and copying.

16. Employee Access to Records

- a. 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:
 - 1) Records of workplace violence hazard identification, evaluation, and correction.
 - 2) Training records,
 - 3) Violent incident logs.

17. Review and Revision of the Workplace Violence Prevention Plan

- a. This WVPP will be reviewed for effectiveness:
 - 1) At least annually
 - 2) When a deficiency is observed or becomes apparent,
 - 3) After a workplace violence incident,
 - 4) Other times, as may be needed.
- b. Review and revision of the WVPP will include the procedures listed in Section 4, Employee Involvement, of this WVPP.
- c. 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 (as applicable).
- d. Review that violence risks are being properly identified, evaluated, and corrected.
- e. Any necessary revisions are made promptly, and significant revisions will be communicated to all employees.

18. Reporting

- a. LEA will immediately report to Cal/OSHA any serious injury or illness, as defined, or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.
 - 1) Immediately means as soon as practically possible but not longer than 8 hours after the LEA knows or with diligent inquiry would have known of the death or serious injury or illness.
- b. “Recommendations and Requirements, Reporting Fatalities and Serious Injuries to Cal/OSHA” provides guidance for reporting.
 - 1) <https://www.vcssfa.org/Risk-Management/Cal-OSHA-Compliance>