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# Workplace Violence Prevention Plan (WVPP) for Merced County Office of Education

Per SB 553 Workplace Violence Prevention Plan (WVPP)  
with references to:  
Education Code 32280-32289.5 Comprehensive School Safety Plan (CSSP)  
and SB 906 Homicidal Threats

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## Table of Contents

|                                       |   |
|---------------------------------------|---|
| Requirements .....                    | 3 |
| Communication .....                   | 4 |
| Hazard Correction.....                | 4 |
| Workplace Violence Incident Log ..... | 6 |
| Training.....                         | 7 |
| Recordkeeping .....                   | 8 |
| Definitions .....                     | 8 |

## Requirements

1. The Merced County Office of Education Workplace Violence Prevention Plan (WVPP) is available and easily accessible to employees, authorized representatives, and OSHA representatives. The plan shall always be in effect in all work areas and be specific to the hazards and corrective measures for each work area and operation. The written plan is an addendum to the Injury Illness and Prevention Plan (IIPP).

The Merced County Office of Education Workplace Violence Prevention Plan is in the primary office of each location inside of the Injury and Illness Prevention Program (IIPP) and online at the MCOE.org website.

2. Workplace Violence Prevention Plan Coordinator:

Workplace Violence Prevention Plan Coordinator

Robert Shepheard

Occupational Health Specialist

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3. The Merced County Office of Education (MCOE) has procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan, including, but not limited the Comprehensive School Safety Plan (CSSP) by:

- Inclusion in safety meetings (e.g., Injury and Illness Prevention Program, Site Safety Team, safety information review with staff, safety drill debriefs)
- Making the plan available to staff, including information about reporting workplace violence and threats
- Conducting site safety evaluations
- Debriefing of incidents (with considerations of confidentiality)
- Providing training
- Posting plan information at each location

4. The Merced County Office of Education (MCOE) will use methods to coordinate the implementation of this plan to ensure that employees understand their respective roles as provided in the plan. These methods shall ensure that all employees are provided the training and that workplace violence incidents involving any employee are reported, investigated, and recorded.

5. The Merced County Office of Education will encourage employees to submit reports of workplace violence events/concerns without fear of reprisal. All employees and other employers are to report violent incidents, threats, or other workplace violence concerns to their immediate supervisor or law enforcement. The Merced County Office of Education will share information with employers and their employees when applicable. Other employers and their employees' respective roles include participation in the Workplace Violence Prevention Plan for reporting, investigating, and recording incidents.

6. Employees must report workplace violence incidents to their site's Workplace Prevention Plan Coordinator, immediate coordinator, or supervisor. Upon

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notifying supervision, employees will fill out the Workplace violence log. Retaliation will be prohibited, and a thorough investigation will be conducted to determine the outcome of information presented by employees. Training and retraining will be performed as part of the requirement to satisfy regulatory requirements

This also satisfies Senate Bill 906. SB 906 (effective July 1, 2023) requires school officials whose duties involve regular contact with pupils in grades K to 12, inclusive, as part of a middle school or high school and who are alerted to or observe any threat or perceived threat to immediately report the threat or perceived threat to law enforcement, as provided.

7. The Merced County Office of Education has adequate procedures to ensure that supervisory and nonsupervisory employees comply with the plan.
8. In addition, The Merced County Office of Education ensures compliance with the plan by:
  - Providing training and information to staff at various times such as, but not limited to, upon hire, annually, or in periodic review as needed.
  - Encouraging reporting of workplace violence and threats.
  - Making the plan available to staff, including information about reporting workplace violence and threats.
  - Conducting site safety evaluations.
  - Debriefing of incidents (with considerations of confidentiality).
  - Posting plan information at locations throughout the Merced County Office of Education.

#### Communication

The Merced County Office of Education has adequate procedures for communicating with employees regarding workplace violence matters. These include, but are not limited to:

- How an employee can report a workplace violence incident, threat, or other workplace violence concern to the employer or law enforcement without fear of reprisal.
- How employees' concerns will be investigated.
- How employees are informed of the investigation results and any corrective actions to be taken.
- Employees are instructed to report workplace violence via periodic reminders and signage near employee labor law posters.

#### Hazard Correction

The Merced County Office of Education has procedures to correct workplace violence hazards, including:

1. Employees or designated representatives can examine and receive a copy of our IIPP by visiting our MCOE website under the Department of Human Resources and Safety. Here, you find the subjects required under section 6401.9 of the California Labor Code for Cal OSHA requirements.

2. Merced County Office of Education sends employees alerts about workplace violence emergencies, which will be disseminated via various communication methods, including, but not limited to, the public address (PA) system, emails, in-person or online meetings, phone calls, newsletters, and training by their supervisors and managers.
3. For non-school sites, evacuation and sheltering plans are accessible and located inside each building. Site maps are posted next to the exit door to know their location. Merced County Office of Education will conduct annual employee training on safe evacuation procedures.
4. For school sites, evacuation and sheltering plans are described in the Comprehensive School Safety Plan (CSSP) available at each location.
5. To obtain help from staff assigned to workplace violence, contact the WVPP Coordinator, site administrator, or manager.
6. The Merced County Office of Education provides all staff with the information included in the Workplace Violence Prevention Plan, SB 906-Homicidal Threats, and, for school sites, the Comprehensive School Safety Plan (CSSP) via email, meetings/trainings, annual acknowledgment/notification, and the Red Binders for sites/Managers.
7. Training is provided in meetings (in-person or virtually) and via online course assignments.
8. The Merced County Office of Education has procedures to identify and evaluate workplace violence hazards, including scheduled periodic inspections to identify unsafe conditions and work practices to address concerns. Inspections shall be conducted when the plan is established, as needed after each workplace violence incident, and when the employer is aware of a new or previously unrecognized hazard.
9. Post-incident response Investigation includes but is not limited to information solicited from employees who experienced workplace violence, witness statements, and investigation findings. The Merced County Office of Education will omit any element of personal identifying information sufficient to allow identification of any person involved in a workplace violence 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.
10. The Merced County Office of Education reviews the plan:

- Annually
- When a deficiency is observed or becomes apparent
- After a workplace violence incident requires it

11. Procedures or other information that may become required by any Regulation of the OSHA Standards Board as necessary and appropriate to protect the health and safety of employees may be included.

The Division (OSHA) shall propose, by December 31, 2025, and the standards board shall adopt, by December 31, 2026, standards regarding the plan required by this section. The standards shall include, at a minimum, the requirements of this section and any additional requirements the division deems necessary and appropriate to protect the health and safety of employees.

#### Workplace Violence Incident Log

The Merced County Office of Education will record workplace violence incidents in a workplace violence incident log. This method is for logging and keeping records of incidents. This link questionnaire places each incident into a spreadsheet and categorizes them based on the incident's time stamp, date, and location. The type of workplace violence incident and detailed description of the incident. The document categorizes whether the employee was injured while working within the scope of the job description. This covers all requirements for Special Education programs and County Office employees. The documentation classifies if law enforcement or emergency response was needed during or after an incident.

[https://docs.google.com/forms/d/e/1FAIpQLSeurTZxjInSHBa4wq4YHdk\\_g32IP4lv2CRdopZXpMYIMW7lKA/viewform?usp=sf\\_link](https://docs.google.com/forms/d/e/1FAIpQLSeurTZxjInSHBa4wq4YHdk_g32IP4lv2CRdopZXpMYIMW7lKA/viewform?usp=sf_link)

For any Special Education or County-run program operating at the school district, the County Office or employer whose employees experienced the workplace violence incident shall record the information in a workplace violence incident log and provide a copy to the County Office or Employer.

The information recorded in the Workplace Violence Log includes all the following:

- (1) The date, time, and location of the incident.
- (2) The type or types of workplace violence involved in the incident.
- (3) A detailed description of the incident.
  - (A) A classification of who committed the workplace 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 another perpetrator.
  - (B) A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.

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

(D) 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
- The threat of physical force or using 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

(E) 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 continuing threats or any other hazards identified by the incident
- Information about the person completing the log, including their name, job title, and completion date

The information recorded in the log for each incident shall be based on information solicited from the employee who experienced workplace violence, witness statements, and investigation findings. The employer shall omit any element of personal identifying information sufficient to allow identification of any person involved in a workplace violence 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.

The log shall be reviewed during any periodic review of the plan.

#### Training

1. The Merced County Office of Education provides practical training to employees. Training material shall be appropriate in content and vocabulary to the employees' educational level, literacy, and language.
2. The Merced County Office of Education provides employees with initial training when the plan is first established and annually.
3. The Merced County Office of Education Workplace Violence prevention plan is available via [mcoe.org](http://mcoe.org) under employee safety and is kept with the Injury and Illness Prevention Plan (IIPP).
4. Training topics may include, but are not limited to:
  - Definitions and requirements
  - How to report a workplace violence incident or concern to the employer or law enforcement without fear of reprisal

- Workplace violence hazards specific to the employees' jobs, the corrective measures the employer has implemented, how to seek assistance to prevent or respond to workplace violence, and strategies to avoid physical harm
  - The workplace violence incident Log
  - An opportunity for interactive questions and answers with someone knowledgeable about the Merced County Office of Education Workplace Violence Prevention Plan
5. Additional training shall be provided when 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 modifications to the plan

#### Recordkeeping

1. Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for at least five years.
2. Training records shall 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.
3. Workplace Violence incident logs shall be maintained for at least five years.
4. Records of workplace violence incident investigations shall be maintained for at least five years. These records shall not contain "medical information."
5. All records shall be made available to OSHA upon request for examination and copying.
6. All records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within fifteen calendar days of a request.

#### Definitions

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

**"Engineering controls"** mean 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"** means the workplace violence incident log.

**"Plan"** means the workplace violence prevention plan.

**"Threat of workplace violence"** means 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 bodily harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

**“Workplace violence”** means any act of workplace violence or threat of workplace 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 everyday objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:
  - **“Type 1 workplace violence”** means 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 workers with the intent to commit a crime
  - **“Type 2 workplace violence”** means violence directed at employees by customers, clients, patients, students, inmates, or visitors. This includes parents, vendors, and contractors
  - **“Type 3 workplace violence”** means violence against an employee by a present or former employee, supervisor, or manager
  - **“Type 4 workplace violence”** means 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 self-defense or defense of others
  - “Work practice controls” means procedures and rules used to reduce workplace violence hazards effectively