

Orange Unified School District

Injury and Illness Prevention Program (IIPP)

CCR Title 8, § 3203



**Risk Management
1401 N. Handy St.
Orange, CA 92867
(714) 628-5390**

PREFACE

PURPOSE

Orange Unified School District (OUSD) is committed to providing a safe and healthful environment for all staff, students, and parents. In pursuit of this endeavor, the OUSD Injury Illness Prevention Program (IIPP) has been established to provide a framework for OUSD to ensure a safe and healthy work environment for all of its employees.

The goal of the program is to eliminate occupational injuries and illnesses. This program has been developed and implemented as required under the California Code of Regulations (CCR), Title 8, Chapter 4, Subchapter 7, Section 3203.

Administration and employees are required to follow the guidelines and procedures set forth in this IIPP document, unless otherwise stipulated.

TABLE OF CONTENTS

INJURY AND ILLNESS PREVENTION PROGRAM

Section 1: Policy Statement.....	1
Section 2: Responsibility.....	2-4
Overview	
Director of Risk Management & Safety	
Management and Principals' Responsibilities	
Supervisors' Responsibilities	
Maintenance and Operations' Responsibilities	
Employees' Responsibilities	
Employees' Rights	
Section 3: Compliance.....	5
Overview	
District Commitment	
Employee Compliance	
Disciplinary Action	
Section 4: Communication.....	6-7
Overview	
General Information	
New Employee Orientation	
Training Program	
Posted/Distributed Information	
Review of Injury & Illness Prevention Program	
Section 5: Accident Reporting and Investigation Procedures.....	8-10
Overview	
Injured Employee Procedure	
Reports to Cal-OSHA	
<u>Investigation</u>	
Overview	
Supervisor's Accident Investigation	
Outside Agency Investigation	
Section 6: Hazard Assessment, Communication and Correction.....	11-13

Overview
Hazard Reporting System
Workplace Hazard Detection

Communication/Correction

Overview
Hazard Correction Responsibilities
 Directors and Principals
 Supervisors
 Employees
 Maintenance & Operations Department
Controlling Access to Areas Containing Hazards
Hazard Correction Follow-Up

Section 7: Training and Instruction.....14-15

Overview
New Employee Orientation
Initial Job Instruction
Pre-Job Safety Instructions for Non-Routine Hazardous Jobs
Safety Talks
 Planned Safety Talks
 Correctional Safety Talks

Section 8: Recordkeeping.....16

Overview
Safety Evaluation Documentation
Employee Injury Reports and Supervisor Accident Investigation Reports
Environmental/Employee Medical Monitoring

WORKPLACE VIOLENCE PREVENTION PROGRAM.....17-27

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 1: POLICY STATEMENT

The Orange Unified School District (OUSD or District) is committed to providing a safe and healthful workplace for all of its employees. The personal safety of each school district employee while performing his or her work activity is of primary importance.

This Injury and Illness Prevention Program (IIPP) has been developed to ensure that the District takes all measures to effectively reduce the number of occupational injuries and illnesses. The success of this program depends on the continuous mutual cooperation and support of management and employees.

OUSD is also committed to ensuring that a safe and healthful workplace exists for outside contractors and other workers that may be working at district sites, and that all health and safety regulations are adhered to by all employees.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 2: RESPONSIBILITY

OVERVIEW

This section of the OUSD IIPP defines the responsibilities of the Director of Risk Management & Safety, management, principals, supervisors, maintenance and operations, and employees. Employee rights are also listed.

DIRECTOR OF RISK MANAGEMENT & SAFETY'S RESPONSIBILITIES

The Director of Risk Management & Safety will serve as the IIPP coordinator for OUSD. The IIPP Coordinator is responsible for implementing and maintaining the following aspects of the safety program:

- Coordinating all risk control activities.
- Maintaining, evaluating and revising the IIPP and conducting investigations of disabling injuries.
- Providing advice and guidance to District management, principals and supervisors.
- Communicating safety objectives.
- Developing and/or assisting in the development of employee training programs.
- Reviewing all accident reports and investigations.
- Ensuring the District is adhering to federal, state and local safety codes.
- Serving as liaison between management and outside safety agencies.

OUSD MANAGEMENT AND PRINCIPALS' RESPONSIBILITIES

OUSD management and principals are responsible, where appropriate for specific elements of the IIPP:

- Managing the injury prevention efforts in their area of responsibility.
- Providing the necessary means of ensuring a safe and healthy work environment for their staff.
- Providing supervisors and employees with safety training and job instruction.
- Managing a planned safety meeting or safety talk program.
- Managing safety discipline.

- Participating in the investigation of disabling injuries.
- Ensuring compliance with federal, state, and local safety codes. (Cal/OSHA safety regulations can be found in CCR Title 8. These regulations are accessible on the internet at [https://www.dir.ca.gov.title8/index/t8index.asp](https://www.dir.ca.gov/title8/index/t8index.asp))

SUPERVISORS' RESPONSIBILITIES

Supervisors have an integral role within the IIPP. Supervisors are in constant and direct contact with their employees and can greatly influence safety attitudes and practices. It is essential that supervisors set the example for employees regarding safety responsibilities. There are several specific responsibilities for supervisors:

- Taking any reasonable action necessary to prevent injuries where an immediate danger exists.
- Taking responsibility for the safety of all employees under their supervision and for any employee not under their supervision, but in the supervisor's work area.
- Providing and maintaining a clean and hazard-free work area.
- Providing safety orientation and job instruction of supervised employees.
- Planning, conducting and documenting safety evaluations in assigned areas of responsibility.
- Conducting planned safety meetings with employees.
- Conducting safety observations of employee safe work practices.
- Developing and maintaining cooperative safety attitudes in employees through the application of approved methods or preventive and corrective discipline.

MAINTENANCE & OPERATIONS' RESPONSIBILITIES

The OUSD Maintenance & Operations Department has a critical role in maintaining all sites and facilities in a proper and safe condition. The IIPP-related responsibilities of the Maintenance & Operations Department are:

- Responding immediately to maintenance work requests concerning safety-related issues. These maintenance requests must be given the highest priority.
- Strictly adhering to procedures in accordance with Cal-OSHA lockout/tagout regulations for locking, blocking, and tagging out unsafe equipment, electrical circuitry, and equipment with moving parts. Lockout/tagout procedures will be used if equipment is in need of repair or is no longer in use.

- Using equipment in a safe manner for which the equipment is intended and according to manufacturers' instructions and recommended rules for safe operation.
- Contracting with outside vendors as necessary to complete repairs that the Maintenance & Operations Department is not trained, equipped, or qualified to perform.
- Posting required safety-related signs as requested by District management and site administrators.

EMPLOYEES' RESPONSIBILITIES

Employees are charged with adhering to the IIPP as directed by management. Employees are responsible for:

- Adhering to all safety rules and operating procedures established by the District.
- Wearing appropriate personal protective equipment (PPE) as required and provided by the District.
- Inspecting and maintaining equipment for proper and safe operation.
- Reporting all injuries immediately.
- Encouraging other workers to work in a safe manner.
- Reporting all observed unsafe acts and conditions to their supervisor.
- Reporting to work in an acceptable condition and not under the influence of alcohol or drugs.

EMPLOYEES' RIGHTS

For occupational safety, employees have the right to:

- Safe and healthful working conditions.
- Receive training in general safe work practices and specific training about hazards unique to any job assignment.
- Refuse work that would violate a health and safety standard or order where such violation would pose a real and apparent hazard to their safety or health.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 3: COMPLIANCE

OVERVIEW

This section of the OUSD IIPP describes the District's commitment to compliance, expectations regarding employee compliance, and action to be taken if employees do not comply with their responsibilities under the IIPP.

DISTRICT COMMITMENT

OUSD is committed to the following:

- Providing a safe and healthy work environment for employees.
- Providing necessary personal protective equipment (PPE) and safety training to employees.
- Maintaining an open-door policy allowing all employees to communicate any safety concerns.
- Adhering to all federal, state, and local safety regulations.
- Providing full cooperation with any outside safety agency during the course of any inspection or audit.

EMPLOYEE COMPLIANCE

Occupational safety and health regulations and workplace practices are designed to reduce or eliminate employee occupational injuries and illnesses. Employee compliance with all rules and regulations is essential to maintaining a safe and healthy workplace. Employees that violate any safety policy, procedures, rules, and/or regulations may be subject to disciplinary action.

DISCIPLINARY ACTION

OUSD uses progressive disciplinary action as the preferred method of discipline for employees who violate District policies, rules and procedures. The objective of progressive discipline is to correct unacceptable behavior or performance of an employee. However, if the performance or behavior is sufficiently serious or frequent, it may be appropriate to progress immediately to a more serious disciplinary measure. Please refer to the District's disciplinary procedures, bargaining unit contracts or the Human Resources department for further information regarding discipline.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 4: COMMUNICATION

OVERVIEW

This section of the OUSD IIPP describes the requirements for communicating IIPP compliance between management and staff. Information is provided in appendices regarding communication mechanisms such as employee trainings and workplace postings.

GENERAL INFORMATION

OUSD recognizes that open, two-way communication between management and staff on health and safety issues is essential to an injury-free productive workplace.

Managers, supervisors, principals, directors, and site administrators are responsible for communicating with all employees about occupational safety and health issues in a manner or form readily understandable by all employees.

Employees are encouraged to inform their managers and supervisors about workplace hazards without fear of reprisal.

The system of communication regarding safety and health at OUSD consists of several methods of delivery designed to facilitate a continuous flow of safety and health information between management and staff. Such delivery methods include new employee orientation training, ongoing safety training, and posted or distributed information.

NEW EMPLOYEE ORIENTATION

All new OUSD employees are required to take a new-hire orientation/training. Safety information communicated to each employee will include, but not be limited to, fire procedures, hazard communication, first aid procedures, injury reporting, back injury prevention, PPE, and blood borne pathogens, where applicable.

Documentation of all new employee training will be maintained in the Risk Management Office via the use of Keenan SafeSchools.

TRAINING PROGRAMS

OUSD is committed to providing all necessary safety training to its employees. Safety training programs are necessary for the District to communicate to employees any hazard associated with their positions and the safe work practices necessary to mitigate those hazards.

Training will be communicated through dialog between trainer and trainee, online courses, safety videos, safety literature, hands-on examples, on-the-job training, seminars, and workshops. Two-way communication during training sessions is

encouraged to ensure that employees understand their training and are afforded the opportunity to ask questions to clarify any information they may not understand initially.

The director/supervisor/principal will review the effectiveness of specific training programs. Recommendations will be communicated to the necessary personnel or agencies conducting the training.

POSTED/DISTRIBUTED INFORMATION

OUSD is committed to providing its employees with accurate and timely safety information. Safety literature, policies/procedures, concerns, and other safety information will be posted in an area accessible to all employees and posted on the District's Risk Management website.

Warning signs and other indicators of a hazardous condition will also be posted at the work site where hazards exist in accordance with applicable laws or District policies.

REVIEW OF INJURY & ILLNESS PREVENTION PROGRAM

This IIPP is to be used as a reference source for safety information pertaining to OUSD. All employees are entitled to review the contents of this IIPP. Each site should have a copy of the program, which must be kept in a location readily accessible to all employees.

All new employees will be informed of the program during orientation.

All employees will be notified of any revisions to the program as the revisions are made.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 5: ACCIDENT REPORTING AND INVESTIGATION PROCEDURES

ACCIDENT REPORTING PROCEDURES

OVERVIEW

This section of the OUSD IIPP explains how employees should report and follow-up on workplace injuries and the requirements for reporting serious and fatal injuries to Cal/OSHA.

INJURED EMPLOYEE PROCEDURE

The following instructions pertain to employees injured in the workplace:

- Immediately report all injuries, mishaps or near misses to your supervisor. Dial 911 if the injury requires immediate attention.
- Complete the following Workers' Compensation forms:
 - Employee Statement of Occupational Injury or Illness
 - Authorization for Release of Patient Health Information
 - California Workers' Compensation Claim Form (DWC 1)
- Receive medical attention at a District-approved medical facility.
- If you are authorized to return to work, submit a Certificate for Return to Work or Further Treatment, provided by the physician, to the Risk Management Office and to your supervisor. If there are work restrictions, review modified duties with the Risk Management Office and your supervisor.
- If you are unable to return to work, notify your supervisor and provide a copy of an off-work statement from the physician to the Risk Management Office and to your supervisor.

REPORTS TO CAL-OSHA

Serious and fatal injuries are to be immediately reported to Cal/OSHA by the Director of Risk Management & Safety or designee. Immediately means as soon as practically possible, but not longer than eight hours after the District knows.

Serious injuries warranting Cal/OSHA notification include injuries that occur in a place of employment or in connection with any employment which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement, but does not include any injury or illness or death caused

by the commission of a Penal Code violation, except the violation of Section 385 of the Penal Code (high voltage accident in excess of 750 volts), or an accident on a public street or highway.

When making such report, whether by telephone or email, the Director of Risk Management & Safety or designee shall include the following information, if available:

- Time and date of accident/event.
- School's name, address, and telephone number.
- Name and job title of person reporting the accident.
- Address of accident/event site.
- Name of person to contact at accident/event site.
- Name and address of injured employee(s).
- Nature of injury.
- Location where injured employee(s) was/were taken for medical treatment.
- List of other law enforcement agencies present at the site of the accident and the names of any attending officers.
- Description of accident and whether the accident scene or instrumentality has been altered.

ACCIDENT INVESTIGATION OVERVIEW

This section of the OUSD IIPP explains how supervisors should perform an employee accident investigation and identifies the OUSD policy for enabling investigations by organizations outside the District.

SUPERVISORS' ACCIDENT INVESTIGATIONS

A diligent investigation will allow management to understand the root cause of an accident and allow management to apply measures to prevent similar accidents from reoccurring. Procedures for investigating employee injuries include:

- Visiting the accident scene as soon as possible. This allows the supervisor to be visible and available to employees in the area, and to observe the scene of the accident before any alterations can be made.
- Interviewing injured workers and witnesses.

- Examining the workplace for factors associated with the accident. It is essential to inspect the scene of the accident to determine if any hazards are present that may cause future accidents.
- Determining the cause of the accident.
- Taking corrective action to prevent the accident from reoccurring. Initiating appropriate work orders when the incident reveals a maintenance or repair issue that could mitigate any future incidents of the same nature. Immediate and complete corrective action is essential.
- Documenting the findings and corrective actions taken by completing a Supervisor's Accident Investigation Report.

OUTSIDE AGENCY INVESTIGATION

Serious injuries and fatalities may also be investigated by agencies outside of the District. Insurance agencies as well as Cal/OSHA, fire departments, law enforcement agencies, and the district attorney may want to investigate serious accidents and fatalities.

The District will cooperate with and assist outside agencies during the course of these investigations.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 6: HAZARD ASSESSMENT, COMMUNICATION AND CORRECTION

HAZARD ASSESSMENT

OVERVIEW

This section of the OUSD IIPP discusses the process for assessing and analyzing hazards to which OUSD employees may be exposed.

HAZARD REPORTING SYSTEM

It is the responsibility of all employees to report unsafe work conditions and practices to their supervisor or site administrator. Unsafe conditions can be submitted anonymously by calling the Risk Management Department at (714) 628-5390.

The District is committed to conducting complete and thorough investigations of all reports of hazardous conditions. If conditions are determined to be hazardous, appropriate measures will be taken by the District to correct those conditions.

WORKPLACE HAZARD DETECTION

The detection of hazards in the workplace is essential in ensuring a safe work environment. Undetected and uncorrected safety hazards may cause accidents resulting in serious injury to employees.

There are two major sources of unsafe conditions:

- **Normal wear and tear of equipment**
Normal wear and tear is the constant process where equipment and areas of facilities deteriorate over time through normal use. Evaluations of equipment and areas can detect hazardous conditions before they cause injury.
- **Employee actions**
Employee actions can contribute to unsafe conditions in several ways, such as misusing or abusing equipment, which can be dangerous. Employees may also leave their work area untidy, which creates a dangerous environment.

HAZARD COMMUNICATION AND CORRECTION

OVERVIEW

This section of the OUSD IIPP describes the responsibilities and processes related to correcting hazards in the workplace.

HAZARD CORRECTION RESPONSIBILITIES

The correction of any identified hazards should be conducted immediately upon detection. Personnel at all levels of employment have responsibilities in hazard correction. All

personnel should have an understanding of their role in hazard correction to effectively eliminate identified hazards.

A work order needs to be submitted to the Maintenance & Operations Department regarding safety hazards.

Directors and Principals

Upon identification of an unsafe or unhealthy work condition or practice, the directors and principals shall:

- Initiate the appropriate corrective action by way of a work order or communication with Maintenance & Operations, or Risk Management.
- Handle conditions involving a serious concealed danger personally until appropriate individuals are notified and corrective action has been taken.

NOTE: A serious concealed danger exists when a condition or work practice creates a substantial probability of death, great bodily harm or serious exposure to harmful substances, to an individual, and the danger is not readily apparent to the individual who is likely to be exposed.

Supervisors

Supervisors are responsible for:

- Identifying and controlling access to a hazard and preventing further danger to employees and the public.
- Notifying the necessary persons responsible for taking any actions required to correct the hazard.
- Investigating and determining the root cause of any unsafe condition. Any source of hazard that is beyond the ability of the supervisor to correct should be immediately reported to senior management.
- Taking temporary precautions until corrections can be made. Supervisors shall provide a status report to the principal or director when a temporary correction has been made.

Employees

All employees are responsible for taking appropriate action to correct unsafe and unhealthy working conditions by immediately notifying appropriate management personnel of the conditions.

Maintenance & Operations Department

The Maintenance & Operations Department is responsible for all repairs to buildings, grounds, and equipment with conditions that create hazards. Any safety-related work order should be given the highest priority to ensure prompt action.

CONTROLLING ACCESS TO AREAS CONTAINING HAZARDS

To prevent danger to employees and the general public, access to any area that contains an immediate hazard or serious danger should be controlled.

Supervisors, directors, and/or principals responsible for the area of operation where such conditions exist are responsible for informing employees verbally and in writing. The notification of any serious hazard should be done as soon as practical.

Only authorized personnel should be allowed access to areas with immediate hazards or serious concealed dangers. Areas with such conditions should be properly secured to prevent any unauthorized access. Students should never be allowed access to such areas. Only when the condition has been corrected should access be permitted.

Examples of areas with immediate hazards include, but are not limited to, construction sites, confined spaces, chemical storage areas, transformers, high voltage areas, and electrical utility rooms.

HAZARD CORRECTION FOLLOW-UP

Whenever any report of an unsafe or unhealthy condition has been made, follow-up is essential to ensure that proper corrections are being or have been made.

Once a reported hazard has been corrected, supervisors, directors, and/or principals responsible for the area should conduct a safety evaluation to ensure that the hazard has been completely eliminated.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 7: TRAINING AND INSTRUCTION

OVERVIEW

This section of the OUSD IIPP discusses the methods used for training and instructing employees on safety issues. Information is presented about formal training, initial job instruction, and safety talks.

NEW EMPLOYEE ORIENTATION

New employees are required to attend an orientation that includes safety as a major topic.

The Director of Risk Management & Safety or designee is responsible for conducting the new employee safety orientation training.

Safety training at the new employee orientation shall include, but not be limited to:

- Injury and Illness Prevention Plan
- Bloodborne Pathogens
- Hazard Communication and Integrated Pest Management Plan (IPM)
- Slips, Trips, and Falls/Strains/Ladder Safety

Employee completion of this training shall be documented and such documentation shall be maintained in the employee's personnel file.

INITIAL JOB INSTRUCTION

When employees move to new occupations, they are confronted with an entirely new environment and may be subjected to a new set of hazards. Safety training is essential for every employee, regardless of whether they are a new hire or whether they have been transferred from another area.

Initial Job Instruction (or Job Position Safety Orientation) refers to the on-the-job training given to new employees to prepare them to do a specific job. This type of safety training is an initial effort to generally acquaint employees with what they will need to know to perform their new positions safely. This type of training shall include topics such as general hazards, clean up, housekeeping responsibilities, and appropriate general safety rules.

PRE-JOB SAFETY INSTRUCTIONS FOR NON-ROUTINE HAZARDOUS JOBS

Supervisors assigning non-routine hazardous jobs are responsible for providing an orientation that covers pre-job safety instructions. During this orientation, the supervisor

will cover specific hazards the employee may encounter and precautions necessary to do the job safely.

Information provided during this type of training should include, but not be limited to:

- Safety equipment and personal protective equipment requirements.
- Potential exposure to toxic materials.
- Emergency procedures.
- Physical hazards associated with the work area.

SAFETY TALKS

Planned Safety Talks

Planned Safety Talks are one of several supervisory tools for ongoing safety instructions designed to increase awareness of hazards, safe job procedures, and critical safety rules.

These talks are short five- to ten-minute instructional talks between the first line supervisor, and one or more employees.

The subject of the talk is a specific topic like a safety rule or a particular hazard.

Planned Safety Talks should be used whenever a new substance, process, procedure, or piece of equipment presenting a new hazard is introduced and/or whenever a supervisor becomes aware of a new or previously unrecognized hazard.

Supervisors may schedule regular safety talks regarding other topics at a frequency that best suits the operations of the department or affected employees.

Correctional Safety Talks

When an employee is observed working in an unsafe manner, it is the responsibility of the supervisor to correct the employee in a manner appropriate to the facts of the case. Correctional Safety Talks should be conducted in a friendly but firm manner.

INJURY AND ILLNESS PREVENTION PROGRAM

SECTION 8: RECORDKEEPING

OVERVIEW

This section of the OUSD IIPP describes the requirements for keeping records about safety evaluations, safety training, employee injuries, supervisor investigations, and environmental and/or employee medical monitoring.

SAFETY EVALUATION DOCUMENTATION

Safety evaluation documents shall:

- Be maintained by the Risk Management Office.
- Include the name of the person(s) conducting the evaluation.
- Include any unsafe conditions or work practices.
- Include corrective actions.
- Be maintained for no less than five years.

EMPLOYEE INJURY REPORTS AND SUPERVISOR ACCIDENT INVESTIGATION REPORTS

The following pertains to documents related to employee injuries:

- The Director of Risk Management & Safety or designee shall maintain employee injury reports and supervisor accident investigation reports.
- Copies of employee injury reports and supervisor accident investigation reports will be maintained by the Risk Management Office and current workers' compensation administrator.

ENVIRONMENTAL AND/OR EMPLOYEE MEDICAL MONITORING

The Director of Risk Management & Safety or designee will maintain environmental monitoring and/or employee medical monitoring documentation for a period of no less than 30 years when the monitoring is required based on a particular job description and risk assessment, and/or incident exposure.

WORKPLACE VIOLENCE PREVENTION PROGRAM

PURPOSE AND AUTHORITY

Senate Bill 553 (Chapter 289, Statutes of 2023) was signed into law in 2023. This legislation mandates employers amend their Injury and Illness Prevention Program (IIPP) to include a Workplace Violence Prevention Plan (WVPP), effective July 1, 2024.

The WVPP is intended to establish a framework for protecting employees from workplace violence. Orange Unified School District (District / OUSD) is committed to having a comprehensive WVPP and in that regard our WVPP includes the following components:

1. Names or job titles of the persons responsible for implementing the plan. If there are multiple people responsible for the plan, their roles shall be clearly described.
2. Effective procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan.
3. Methods that will be used to coordinate implementation of the plan with District employees and other non-District employers, when applicable, to ensure that everyone understands their respective roles, as provided in the plan.
4. Effective procedures for all employees to accept and respond to reports of workplace violence, and to prohibit retaliation against an employee who makes such a report.
5. Effective procedures to ensure that supervisory and nonsupervisory employees comply with the plan.
6. Effective procedures to communicate with employees regarding workplace violence matters, including, but not limited to, both of the following:
 - a. How an employee can report a violent incident, threat, or other workplace violence concern to the District or law enforcement without fear of reprisal.
 - b. How employee concerns will be investigated.
7. Effective procedures to respond to actual or potential workplace violence emergencies, including, but not limited to, all of the following:
 - a. Effective means to alert employees of the presence, location, and nature of workplace violence emergencies.
 - b. Evacuation or sheltering plans that are appropriate and feasible for the worksite.
 - c. How to obtain help from staff assigned to respond to workplace violence emergencies, if any, security personnel, if any, and law enforcement.
8. Procedures to develop and provide employee training.

9. Procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic inspections to identify unsafe conditions and work practices, in addition to employee reports and concerns. Inspections shall be conducted:
 - a. When the plan is first established.
 - b. After each workplace violence incident.
 - c. Whenever the District is made aware of a new or previously unrecognized hazard.
10. Procedures to correct workplace violence hazards identified above, in a timely manner 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. Procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan.
11. Maintain a written log recording incidents of workplace violence.

GENERAL DISCLOSURE

The Orange Unified School District is a California public school district serving students in grades PK – 12 grades in the cities of Orange, Villa Park, Anaheim, Garden Grove, Santa Ana, and unincorporated county areas. The district consists of 42 educational sites and serves approximately 25,000 students with a diverse population.

It is recognized that certain classifications of certificated and classified employees working with students that have the potential for behavioral issues, exposes these employees to limited forms of violence in the workplace. It is further understood that these unique positions and the employees assigned to them receive instruction on classroom management and crisis reduction techniques to mitigate student behaviors from escalating.

It is recognized that certain classifications of employees working with students and their families exposes these employees to limited forms of violence in the workplace. It is further understood that these front-facing positions and the employees assigned to them are supported by measures to prevent and address workplace violence.

WORKPLACE VIOLENCE DEFINED

California Labor Code § 6401.9 has established the following definitions in regard to WVPP:

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 worker and the hazard.

Log - The violent incident log required by California Labor Code § 6401.9.

Plan - The workplace violence prevention plan required by California Labor Code § 6401.9.

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.

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

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.
- The following four workplace violence types:
 - **Type 1:** 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:** Violence directed at an employee by a student, parent, contractor, consultant, or visitor.
 - **Type 3:** Violence directed at an employee by a present or former employee, supervisor, or manager.
 - **Type 4:** Workplace violence committed by a person who does not work there but has or is known to have a personal relationship with an employee.

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

PREVENTING WORKPLACE VIOLENCE

One component to an effective WVPP is its strategy regarding prevention. Becoming familiar with the District's WVPP is an important first step in preventing workplace violence. It is imperative that all employees understand this plan.

All District administrators and supervisors are expected to discuss the District's WVPP with their returning staff, so they understand how to handle intimidating, threatening, or violent incidents as well as understand the consequences of such behavior.

The District's WVPP is available on the Risk Management website located at: bit.ly/OUSTRM or by scanning the QR code:



The best prevention strategy is maintaining a work environment which minimizes negative feelings, such as isolation, resentment, and hostility among employees. There are several steps that District administrators and supervisors can take to help create a professional, healthy, and caring work environment. These include, but are not limited to:

- Promoting sincere, open, and timely communication;
- Ability to access mental health services;
- Offering opportunities for professional development;
- Fostering a friendly work environment;
- Maintain mechanisms for complaints and concerns and allowing them to be expressed in a non-judgmental forum that includes timely feedback to the initiator;
- Promoting "quality of life" issues such as facilities and job satisfaction; and
- Maintain impartial and consistent discipline for employees who exhibit improper conduct and poor performance.

Maintaining a secure and physically safe workplace is essential for preventing workplace violence. The currently District uses a variety of security measures to help ensure safety. The measures used depend on the resources available in the area. These may include:

- The adequate and trained campus security personnel to respond to requests for assistance;
- The use of We-Tip – Say Something Anonymous Reporting System for reporting crime;
- Employee photo identification badges to be worn at all times;
- The use of surveillance (camera) systems and visitor management systems;
- Two-way emergency radio systems to communicate with school personnel and School Resource Officers; and
- Additional law enforcement assistance is available through local police for emergency situations. Employees should notify campus security personnel, and/or administration of suspicious or unauthorized individuals on District property.

Education and communication are also critical components of any prevention strategy. It is essential to communicate an awareness among employees, supervisors, and managers regarding all aspects of the District's WVPP. Recognizing possible problems, identifying employee and management responsibilities, establishing early intervention techniques, who to call for assistance, offering techniques designed to effectively deal with conflict resolution and stress reduction are all elements of effective awareness strategies.

PERSON RESPONSIBLE FOR WVPP

The **ORANGE UNIFIED SCHOOL DISTRICT** hereby assigns responsibility for development, implementation, and maintenance of the WVPP to the Director, Risk Management and Safety.

The Safety Coordinator will coordinate with the site administrator to conduct any necessary site hazard assessments.

The Executive Director of Elementary Education, the Executive Director of Secondary Education, and the Executive Director of Student & Community Services are responsible for ensuring the implementation of the WVPP at their respective sites.

Site administration is responsible for implementing the WVPP at their sites and for providing an opportunity for interactive questions and answers about the WVPP.

District employees may also submit their questions about the WVPP directly to the Director of Risk Management and Safety via email at dgaeta@orangeusd.org.

PROCEDURES FOR DEVELOPMENT AND IMPLEMENTATION OF THE WVPP

We recognize that open, two-way communication between leadership and staff about workplace security issues is essential to a safe and productive workplace. Involving District employees in the development and implementation of the WVPP is a key component to the program's overall effectiveness. The District encourages employees to participate in both the initial development and implementation as well as the ongoing annual refresher of this plan. The District utilizes the following procedures to involve employees in the development and implementation of this plan:

1. The District has a long-standing commitment to safety and security. As of 2022, the Offices the Offices of Student and Community Services, Risk Management and Safety, Maintenance and Operations, and Technology Services conducted safety walk-throughs at all OUSD school sites. Additionally, district and school site leaders, staff, local law enforcement representatives, and OUSD families participated in our four Community Safety Forums. At these forums, information was shared about OUSD's safety initiatives as a result of the safety walk-throughs; in addition, invaluable community feedback was gathered in the areas of safety and security, as well as professional development needs.
2. The District has retained a consultant to conduct a comprehensive review and provide support for this Workplace Violence Prevention Plan, our District-wide Comprehensive School Safety Plans, Emergency Operations Center, and overall emergency response plans.
3. School Site Councils, consisting of parents, teachers, staff, and the principal, meet regularly to discuss school plans and evaluate the effectiveness of school programs. Safety matters affecting schools are reviewed by the Safety Committee, a sub-committee of the School Site Council. The development, implementation, and evaluation of the Workplace Violence Prevention Plan

(WVPP) will continue to follow the District's established process.

4. District employees may also submit their ideas for improvement directly to the Director of Risk Management and Safety via email at dgaeta@orangeusd.org.

PROCEDURES TO COORDINATE IMPLEMENTATION OF THE WVPP WITH OTHER EMPLOYERS

OUSD may engage outside employers to conduct work and/or services at district sites. Other employers are required to have their own WVPP, as required by law. OUSD will work with any employer who the District engages for services to ensure this is not a contraction in roles and responsibility of employees. Additionally, the District will post the WVPP on the following websites including but not limited to Risk Management, Purchasing, and Facilities & Planning to ensure access to the OUSD WVPP by other employers.

PROCEDURES TO ACCEPT AND RESPOND TO REPORTS OF WORKPLACE VIOLENCE

The District will accept reports of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed.

No employee will be subjected to termination, retaliation, or discrimination for making complaints, instituting proceedings, testifying with regards to employee workplace violence, or reporting a workplace violence incident.

The District will respond to reports of workplace violence upon notification through investigation and mitigation of any identified hazards. Reports of workplace violence will be maintained as required by law and for use in the annual Workplace Violence Prevention Program review and update.

PROCEDURES TO ENSURE EMPLOYEES COMPLY WITH THE WVPP

While the Director of Risk Management and Safety is responsible for overseeing the development, implementation, and maintenance of the WVPP, all employees are responsible for adhering to their roles, responsibilities and training provided under this plan. The following procedures will be used to ensure employees comply with the WVPP:

- Ensure employees take/attend the necessary training(s) assigned to them;
- Monitor employee adherence to topics and concepts covered in the training;
- Retrain employees who do not follow safe and healthful work practices; and
- Reinforce with employees the elements of the WVPP throughout the year.

EMPLOYEE COMMUNICATION, REPORTING WORKPLACE VIOLENCE, AND RESPONSE

An effective reporting system: **(1)** protects OUSD employees from harm in the workplace; **(2)** assists leadership in its effort to maintain a safe and productive work environment; and **(3)** ensures leadership the opportunity to investigate and determine the cause(s) and make recommendations to minimize recurrence. All workplace violence incident reports must be in writing.

Any employee who witnesses or encounters any act of violence should do the following without the fear of reprisal:

- Call 9-1-1, when imminent danger is present, as appropriate.
- Immediately notify their supervisor or administrator on site.
- Complete a Workplace Violence Report at <https://bit.ly/OUSDREPORTWORKPLACEVIOLENCE>



All reports of workplace violence will be investigated by OUSD and/or appropriate law enforcement agency, if applicable. OUSD will inform the reporting employee, if known, the results of the investigation and correction action taken, if any.

EMPLOYER'S EVALUATION & RESPONSE

When responding to a report of workplace violence, the supervisor and/or the Director of Risk Management and Safety or Safety Coordinator will adhere to the following process:

1. Determine any additional steps that need to be taken to protect the reporting employee, or any other employee, against an immediate threat of violence.
2. Investigate the report to gather all relevant information (interview threatened and injured employees, interview witnesses, visit the location as soon as possible, document evidence, ask follow-up questions).
3. Examine the workplace for factors associated to security. Evaluate the findings to identify the root cause.
4. Define corrective actions/steps to be taken to address each cause.
5. Coordinate with the necessary departments/staff to implement the corrective actions.
6. Communicate the findings and corrective actions back to the reporting employee, if known.
7. Monitor the effectiveness of the corrective actions.
8. Document the investigation for recordkeeping, reporting purposes, and annual Workplace Violence Prevention Program review and update.

PROGRAM CONTROLS

In situations where a hazard cannot be completely eliminated, the District will adhere to the following hierarchy of controls to reduce the risk to employees:

1. Engineering Controls
 - Engineering controls reduce the hazard through substitution or design. An example of an engineering control would be the installation of a physical barrier to protect employees from visitors (deep counters). Engineering controls are not always feasible. If engineering controls are not feasible, the District will then consider work practice controls.
2. Administrative Controls
 - Administrative controls reduce the hazard by changing organizational policies and procedures. An example of an administrative control would be requiring check-in procedures to account for employees who work alone and are not under the direct supervision of leadership while on campus.
3. Personal Protective Equipment (PPE)
 - Generally, this type of intervention is not relevant to workplace violence prevention. An example of personal protective equipment would be ballistic body armor for law enforcement personnel.

RESPONSE TO ACTUAL OR POTENTIAL WORKPLACE VIOLENCE EMERGENCIES

In the event of actual or potential workplace violence emergencies, it is critical to have clearly defined procedures to ensure the safety of students and staff. This document outlines the protocols for responding to such incidents, including the terms “lockdown” and “shelter-in-place,” and provides detailed instructions for staff and students to follow during these emergencies. By understanding and adhering to these guidelines, individuals can take appropriate actions to protect themselves and others, ensuring a coordinated and effective response to threats of violence on campus.

The term “lockdown” communicates the need for students and staff to assess the need to run, hide, or fight. Individuals on campus who stay indoors are encouraged to lock and barricade their doors, cover their windows, turn the lights off, and call 911 if necessary. A lockdown will be called in the event of a violent incident on campus that requires an immediate police response.

The term “shelter-in-place” communicates the need for students and staff to stay in their classrooms and lock their doors. Normal school operations can continue under these conditions. A shelter-in-place notice will be advised in the event of a potentially dangerous situation on or around campus that can be mitigated by keeping people indoors (e.g., dangerous animal on campus, police activity near a campus, hazmat incident near a campus, etc.).

If an intruder enters your school campus:

- Activate lockdown protocol.
- Disengage the lock block and shut the door immediately.
- Block doors with any available furniture and cover windows.
- Turn off the lights and stay out of sight from doors and windows.
- Monitor your school's source of communication for updates.
- Silence all cell phones.
- Await further instruction. Call 911 or the front office if someone is injured or if you have information on the intruder.

As a last resort and only when your life or another is in imminent danger. Use the most available and prudent options:

1. **RUN** – Run for safety away from danger.
2. **HIDE** – Hide somewhere that is safe. If you are unable to safely evacuate, hide in an area out of the threat's view. Find a shield. Silence your cell phone ringer. Call or request for someone to call 911 when it is safe to do so.
3. **FIGHT** – Take Action. As a last resort, attempt to incapacitate the threat. Use physical aggression and action to overpower the threat. Call for assistance to others in the area. Call or request for someone to call 911 when it is safe to do so.

EMPLOYEE TRAINING

Employees will be provided with initial training when the plan is first established, and annually thereafter, on all of the following:

1. The definitions and requirements of Senate Bill 553.
2. The District's WVPP plan, how to obtain a copy of the plan at no cost, and how to participate in the further development and implementation of the plan.
3. How to report workplace violence incidents or concerns to the District and/or law enforcement, without fear of reprisal.
4. Workplace violence hazards specific to an employee's job, the corrective measures implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
5. The required violent incident log and how to obtain copies of records.
6. An opportunity for interactive questions and answers with a person knowledgeable about the District's plan.

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 changes to the plan.

RECORDKEEPING

Records of workplace violence hazard identification, evaluation, and correction will be created and maintained for a minimum of five (5) years.

Training records will be created and maintained for a minimum of one (1) 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 a minimum of five (5) years.

Records of workplace violence incident investigations will be maintained for a minimum of five (5) 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.

The Director of Risk Management and Safety shall be responsible for ensuring that all relevant records are completed, maintained, and made available upon request as required by this plan or upon request of the California's Division of Occupational Safety and Health.

ANNUAL WORKPLACE VIOLENCE PREVENTION PROGRAM REVIEW AND UPDATE

The District's workplaces will be annually evaluated to determine the presence of factors or situations in the workplace that might place employees at risk of workplace violence.

1) Records

The District will examine any records from the past year that concern workplace violence incidents to identify patterns in the type and cause of injuries. The examination will look to identify patterns of injuries in particular areas of the workplace or incidents which involve specific operations or specific individuals. Examples of records that may be examined include, but are not limited to:

- a. Workplace violence incident reports;
- b. Injury and illness documentation;
- c. Worker's compensation reports;
- d. Disciplinary reports.

2) Administrative Risk Factors

The District will examine relevant policies, work practices, and work procedures that may impact the risk of workplace violence. Examples include, but are not limited to:

- a. District-wide school safety plan;
- b. Building-level emergency response plan(s);
- c. Policies related to non-discrimination and anti-harassment, school visitors, comprehensive school safety plans, threats of violence, prohibition of

weapons on school grounds, and the use of timeout and physical restraint;

- d. Use of District-issued identification badges;
- e. Safety trainings including but not limited to Emergency Response, Stop the Bleed, Critical Incident Stress Management (CISM), Automated External Defibrillator (AED), Comprehensive School Safety Plan (CSSP), and Comprehensive School Threat Assessment Guidelines (CSTAG);
- f. Procedures related to controlling or diffusing a potentially violent situation.

3) The Physical Environment

The District will evaluate the workplace sites to determine the presence of factors or situations which may place employees at risk of workplace violence. Factors which might place an employee at risk include, but are not limited to:

- a. Working in public-facing settings;
- b. Working late night or early morning hours;
- c. Exchanging money with the public;
- d. Uncontrolled access to the workplace;
- e. Areas of previous security problems.

This evaluation may also include:

- a. Considering security features such as whether there is a reception area, there is adequate lighting in and around the workplace, there are multiple exits, door controls, and video monitors.
- b. Reviewing whether campus security is present and, if so, where they are posted, direct staff to patrol the campus in a random manner, and if they are provided with communication.
- c. Describing the building.

###