

MT. PLEASANT ELEMENTARY SCHOOL DISTRICT

WORKPLACE VIOLENCE PREVENTION PLAN

June 19, 2024

MPESD's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by <u>Labor Code (LC) section</u> 6401.9.

Date of Last Review: May 22, 2024

Date of Last Revision(s): June 18, 2024

District Specific Plan Detail

Site Specific Plan Detail

DEFINITIONS

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

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

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

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

Serious injury or illness - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

Threat of violence - Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

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

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

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:

Type 1 violence - Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

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

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

Type 4 violence - Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

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

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

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PURPOSE AND AUTHORITY

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

The WVPP, a component of the Injury and Illness Prevention Program, is intended to establish a framework for protecting employees from workplace violence. This plan includes the following components:

- 1. Names or job titles of the persons responsible for implementing the plan. If there are multiple persons 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 other employers, when applicable, to ensure that those employers and employees understand their respective roles, as provided in the plan.
- 4. Effective procedures for the employer to accept and respond to reports of workplace violence, and to prohibit retaliation against an employee who makes such a report.
- 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 employer 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 and employee reports and concerns. Inspections shall be conducted:
 - a. When the plan is first established.
 - b. After each workplace violence incident.
 - c. Whenever the employer 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.

PERSON(S) RESPONSIBLE FOR IMPLEMENTING THE WVPP

The ultimate responsibility for overseeing the development, implementation, and maintenance of the Workplace Violence Prevention Plan (WVPP), rests with the Director of Personnel and IT Services, Dr. Sandra Jewett. Dr. Jewett has the authority and responsibility for implementing the provisions of this plan for MPESD.

In addition, all administrators, managers and supervisors are responsible for implementing and maintaining the WVPP in their areas and for answering employee questions about the WVPP. Their roles are clearly described below.

Responsible	Job	WVPP Responsibilities	Phone #	Email
Persons	Title/Position			
Dr. Sandra Jewett	HR/IT Director	Overall responsibility for the Plan; Dr. Jewett approves the final plan and any major changes.	408.223.3745	SaJewett@mpesd.org
Tracy Huynh	Chief Business Officer	Responsible for employee involvement and training; Ms. Huynh organizes safety meetings, updates training materials, and handles any reports of workplace violence.	408.599.0719	THuynh@mpesd.org
Kevin Hutchings	Chief of Maintenance & Operations	Responsible for employee involvement and training; Mr. Hutchings organizes safety meetings, updates training materials, and handles any reports of workplace violence.	408.219.0994	KHutchings@mpesd.org
Sites/Depts:				
Dr. Anthony Alvarado	Principal of IJA/VV	Responsible for emergency response, hazard identification, and coordination with other district administrators; Dr. Alvarado conducts safety inspections, coordinates emergency response procedures, and communicates with other administrators and/or supervisors about the plan.	408.599.0884	AAlvardo@mpesd.org
Jeannette Carson	Principal of Robert Sanders	Responsible for emergency response, hazard identification, and coordination with other district administrators; Ms. Carson conducts safety inspections, coordinates emergency response procedures, and communicates with other	408.599.8980	JCarson@mpesd.org

		administrators and/or		
D 1/5	D: : 1 c	supervisors about the plan.	100 500 1155	D/II
Raquel Topete	Principal of August Boeger	Responsible for emergency response, hazard identification, and coordination with other district administrators; Ms. Topete conducts safety	408.599.4657	RTopete@mpesd.org
		inspections, coordinates emergency response procedures, and communicates with other administrators and/or		
Gilbert Rodriguez	Principal of MP/IJA	supervisors about the plan. Responsible for emergency response, hazard identification, and coordination with other district administrators; Mr. Rodriguez conducts safety inspections, coordinates emergency response procedures, and communicates with other administrators and/or supervisors about the plan.	408.599.4237	GiRodriguez@mpesd.org
Lisa Kattenhorn	ELOP Coordinator	Responsible for emergency response, hazard identification, and coordination with other district administrators; Ms. Kattenhorn conducts safety inspections, coordinates emergency response procedures, and communicates with other administrators and/or supervisors about the plan.	408.209.7758	<u>LKattenhorn@mpesd.or</u>
Daniel Patton	MPAS Coordinator	Responsible for emergency response, hazard identification, and coordination with other district administrators; Mr. Patton conducts safety inspections, coordinates emergency response procedures, and communicates with other administrators and/or supervisors about the plan.	408.314.6406	DPatton@mpesd.org
Jessica Tejada	UPK/ECE Coordinator	Responsible for emergency response, hazard identification, and coordination with other district administrators; Ms. Tejada conducts safety inspections, coordinates	408.599.4277	JTejada@mpesd.org

		emergency response procedures, and communicates with other administrators and/or supervisors about the plan.		
Marisa Peña	Student Advisor of IJA/VV and AB	Responsible for emergency response, hazard identification, and coordination with other district administrators; Ms. Peña conducts safety inspections, coordinates emergency response procedures, and communicates with other administrators and/or supervisors about the plan.	408.531.5833	MPena@mpesd.org
Alejandro Heredia	IT Manager	Responsible for implementing and maintaining the WVPP in their work areas and for answering employees' questions about the Plan.	408.476.2578	AHeredia@mpesd.org
Laurie Breton	Director, Student Services/Special Education	Responsible for implementing and maintaining the WVPP in their work areas and for answering employees' questions about the Plan.	408.406.7977	LBreton@mpesd.org
Dina Chung	Director, Curriculum Instruction and Assessment	Responsible for implementing and maintaining the WVPP in their work areas and for answering employees' questions about the Plan.	408.506.6550	DChung@mpesd.org
Karissa Gire	Nurse – Districtwide	Responsible for implementing and maintaining the WVPP in their work areas and for answering employees' questions about the Plan.	510.366.0361	KGire@mpesd.org
Dr. Elida MacArthur	Superintendent	Responsible for implementing and maintaining the WVPP in their work areas and for answering employees' questions about the Plan.	669.333.2005	EMacArthur@mpesd.org

EMPLOYEE ACTIVE INVOLVEMENT

MPESD welcomes and encourages employees to participate in both the initial development and implementation as well as the ongoing/annual refresher of this plan. The District utilized the following procedures to involve employees in the development and implementation of this plan:

- Integrated elements from both the 2024-2025 Comprehensive School Safety Plans and the 2024 Emergency Procedures developed by the sites.
- Established a WVPP committee to obtain the active involvement of employees, regardless of
 classification, in developing and implementing the plan. Certificated employees who do not
 often complete their 13-hour log will be invited to participate in an effort to encourage
 less-involved employees to participate in the WVPP committee. Classified and hourly
 employees will be invited to participate via emails and personal invitations from their site
 supervisors.
- Input will be focused on identifying, evaluating, and determining corrective measures to prevent workplace violence. This approach will allow for monthly safety meetings with employees to discuss identification of workplace violence-related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These monthly employee meetings, including staff meetings, will include brainstorming sessions, discussions of recent incidents, and reviews of safety procedures or concerns and how to correct them.
- Implementing an employee survey soliciting feedback and input on specific aspects of both the development and implementation of this plan through the use of "ThoughtExchange", an anonymous open-ended survey.
 - o The latest report can be found here.
- Request employees to submit their ideas directly to their site supervisors or to Dr. Jewett as
 identified on the above Table.
- In partnership with Keenan, the District's insurance provider, employees will be required to participate in their newly created training modules. In addition, employees are encouraged to participate in designing and implementing training programs, and their suggestions are incorporated into the training materials. For example, an employee might suggest a new training scenario based on a recent incident.
- Management 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.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment, per Board Policy 5317.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

Feedback and input from members of the Safe School Committee and members of the WVPP committee are as follows:

Safe School Committee	Location	Position
Members		
Ms. Raquel Topete	August Boeger Middle School	Principal
Ms. Michele Mejia	August Boeger Middle School	Health Clerk
Mrs. Laurie Breton	District Office	Student Support Services

Mr. Cillaret Dadriana	M+ D1/IJ- I A J	D.:
Mr. Gilbert Rodriguez	Mt. Pleasant/Ida Jew Academy	Principal
Mrs. Barbara Powell-Padilla	Mt. Pleasant/Ida Jew Academy	Teacher
Norma Meza	August Boeger Middle School	School Secretary
Ms. Talia Venancio	Ida Jew Academy/Valle Vista	Teacher
Ms. Claudine Iniguez	Robert Sanders School	Health Clerk
Mrs. Samantha Rocha	Robert Sanders School	Teacher
Ms. Lisa Martinez	Mt. Pleasant Elementary/Ida Jew	Instructional Assistant
Ditra Row	Ida Jew Academy/Valle Vista	Teacher
Workplace Violence Prevention	Location	Position
Members		
Danny Patton	MPAS	Afterschool Programs Director
Karen Sanders	Distict-Wide	Teacher on Special Assignment
Kevin Asano	Robert Sanders	Teacher
Ketan Banjara	August Boeger Middle School	Special Education Teacher
Kevin Hutchings	District Office	Chief, Facilities & Operations
Tracy Huynh	Business Office/Food Services	Chief Business Officer
Alex Heredia	Information Systems	IT Manager
Jayne Chu	District Office	A/P Technician
Dr. Sandra Jewett	District Office	HR/Plan Administrator

WVPP IMPLEMENTATION & COORDINATION

In an effort to ensure that all employees understand their respective roles in this plan, all aspects of this plan, and how to report incidents of workplace violence, we will take the following steps:

- 1. Provide employee training and verify comprehension (i.e., quizzes/tests) using the Keenan modules and/or employee directed training for specific scenarios.
- 2. Post and share meeting agendas and minutes from committees or teams involved in the development of this plan as outlined in Section 2 above.
- 3. Generating emails, newsletters, memos, or other means of communication providing updates to all employees at various stages throughout the development and implementation of this plan, including timelines and next steps.

Communication

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

- New employee orientation includes workplace violence prevention policies and procedures.
- Online workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns will take place at monthly staff meetings and online

training modules in an employee's first language will be available.

- Posted or distributed workplace violence prevention information.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
- Using the CatapultK12 app, (also known as "We Tip") employees can anonymously report a violent incident, threat, or other violence concerns.
- In case of an emergency, the contact information is provided in the above Table. Employees will reach out to their immediate site supervisors via phone. In addition, our phone system has been updated to be in compliance with Kari's law which automatically notifies the front desk receptionist or the appropriate administrator for every 911 call made within the District and its schools.
- 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.
- The WVPP will be posted in the District and at each of the school sites for employees to review and offer suggestions.
- Updates on the status of investigations and corrective actions are provided to employees through email and at safety meetings. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.
 - o For example: updates will be provided during the regularly scheduled meetings, such as during their daily/weekly/monthly/quarterly meetings with other administrators in the district to discuss the plan and any updates. These meetings would involve sharing updates to the plan, discussing recent incidents, and coordinating training sessions so that they may share them with their respective staff.

Coordination with Contractors and Volunteers

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

- Both contractors and employees will be trained in workplace violence prevention.
- Workplace violence incidents involving any contractors or volunteers are reported, investigated, and recorded.
- At the District's school sites, each site will ensure that if its employees experience a workplace violence incident, their site administrator will record the information in the violent incident log and shall provide a copy of that log to Dr. Jewett.

PROCEDURES TO ACCEPT & RESPOND TO REPORTS OF WORKPLACE VIOLENCE

Employees should report workplace violence to their site/department supervisors, who will inform Dr. Sandra Jewett, the WVPP administrator. In the event the threat/act of violence is imminent and

serious, 9-1-1 will be called. The site/department supervisors will adhere to the following process for accepting and responding to reports of workplace violence:

- All threats or acts of workplace violence are reported to the employees' site supervisor or department, who will inform the WVPP administrator. This will be accomplished by a phone call or email. If that is not possible, employees will report incidents directly to Dr. Sandra Jewett, the WVPP administrator.
- Employees can report incidents to their supervisor, HR, or through CatapultK12 app or by phone or email.
 - o The Workplace Violence Reporting form can be filled out <u>physically (printable)</u> or <u>digitally (CatapultK12)</u>. The Form will be used to document the incident and all correlating information for recordkeeping and reporting purposes.



The site/department supervisor or the Plan Administrator will investigate the report to gather all relevant information (interview employees, visit the location, document evidence, and ask follow-up questions). Upon completion of the investigation, the District will evaluate the findings to identify the root cause and define corrective action and/or steps to be taken to address each cause. In addition, the Plan Administrator will coordinate with the appropriate department(s)/staff to implement the corrective actions. These findings and corrective actions will be communicated back to the reporting employee. Site/department supervisors and the Plan Administrator will monitor the effectiveness of the corrective actions.

All employees are encouraged to report any concerns or incidents related to workplace violence. They can do so without fear of reprisal.

The district prohibits retaliation against anyone who files a complaint against an employee or reports an employee's inappropriate conduct. Any employee who retaliates against any such complainant, reporter, or other participant in the district's complaint process shall be subject to discipline (Board Policy 4119.21).

EMERGENCY RESPONSE PROCEDURES

MPESD has in place the <u>School Safety and Emergency Preparedness Plan</u> at each site. Moreover, MPESD has in place the following specific measures to handle actual or potential workplace violence emergencies:

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

- Alarm systems and PA announcements will be used to alert employees of emergencies. (The alarms could be audible alarms, visual alarms, or both.)
- The District and each of its sites has evacuation or sheltering plans posted in every building and classrooms.
 - <u>August Boeger Map</u> | <u>Ida Jew Valle Vista Map</u> | <u>Mt. Pleasant Ida Jew Map</u> | <u>Robert Sanders Map</u>
- If there is immediate danger, call for emergency assistance by dialing 9-1-1, and then notify the site/department supervisor. They will then contact Dr. Sandra Jewett, the Plan Administrator. The following contact information for response staff and local law enforcement will be posted in the faculty lounge and office area at each of the sites.

In the event of an emergency, including a Workplace Violence Emergency, contact the following individuals:

Dr. Anthony	Principal of	Responsible for emergency	408.599.0884	AAlvardo@mpesd.org
Alvarado	IJA/VV	response, hazard	100.0551.0001	
Tilvaracio	-57	identification, and		
		coordination with other		
		district administrators; Dr.		
		Alvarado conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
		supervisors about the plan.		
Jeannette Carson	Principal of	Responsible for emergency	408.599.8980	ICarson@mpesd.org
Jeannette Carson	Robert Sanders	response, hazard	400.377.0700	<u>Jeanson(a)mpesu.org</u>
	Robert Sanders	identification, and		
		coordination with other		
		district administrators; Ms.		
		Carson conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
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D 177 .	D · · 1 C	supervisors about the plan.	400 500 4757	PT ()
Raquel Topete	Principal of	Responsible for emergency	408.599.4657	RTopete@mpesd.org
	August Boeger	response, hazard		
		identification, and		
		coordination with other		
		district administrators; Ms.		
		Topete conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
		supervisors about the plan.		
Gilbert Rodriguez	Principal at	Responsible for emergency	408.599.4237	GiRodriguez@mpesd.or
	MP/IJA	response, hazard		g
		identification, and		

	1	I	T	
		coordination with other		
		district administrators; Mr.		
		Rodriguez conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
		supervisors about the plan.		
Lisa Kattenhorn	ELOP	Responsible for emergency	408.209.7758	LKattenhorn@mpesd.o
Lasa Natternioni			400.209.7730	
	Coordinator	response, hazard		rg
		identification, and		
		coordination with other		
		district administrators; Ms.		
		Kattenhorn conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
		supervisors about the plan.		
Daniel Patton	MPAS	Responsible for emergency	408.314.6406	DPatton@mpesd.org
Damer ratton	Coordinator	response, hazard	100.514.0400	Di attorita, impesa.org
	Coordinator	identification, and		
		coordination with other		
		1		
		district administrators; Mr.		
		Patton conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
		supervisors about the plan.		
Jessica Tejada	UPK/ECE	Responsible for emergency	408.599.4277	ITejada@mpesd.org
J = = = = = = = = = = = = = = = = = = =	Coordinator	response, hazard		3)
	Gooramator	identification, and		
		coordination with other		
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		district administrators; Ms.		
		Tejada conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
		supervisors about the plan.		
Marisa Peña	Student Advisor	Responsible for emergency	408.531.5833	MPena@mpesd.org
	of IJA/VV and	response, hazard		
	AB	identification, and		
		coordination with other		
		district administrators; Ms.		
		Peña conducts safety		
		inspections, coordinates		
		emergency response		
		procedures, and		
		communicates with other		
		administrators and/or		
	I	supervisors about the plan.		1

Alejandro Heredia	IT Manager	Responsible for	408.476.2578	AHeredia@mpesd.org
		implementing and		
		maintaining the WVPP in		
		their work areas and for		
		answering employees'		
		questions about the Plan.		

The Emergency Preparedness Plan can be found here.

PROCEDURES TO ENSURE EMPLOYEES COMPLY WITH THE WVPP

While Dr. Sandra Jewett, Director of HR & IT Services 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. Supervisors and managers will use the following procedures to ensure employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

- Ensuring employees take/attend the training(s) and refresher training(s) assigned to them, using the online Keenan learning modules.
- Monitor employee adherence to topics and concepts covered in the training they received.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing the efforts of employees who demonstrate safe work practices that promote the WVPP in the workplace via school bulletins and certificates of recognition from their site/department supervisors.
- Follow our established disciplinary action process if an employee or supervisor does not follow elements of this plan.

Disciplinary Action

We will actively enforce all aspects of the WVPP. A classified employee that fails to adhere to the procedures and practices of this plan shall be disciplined.

- 1. Retraining
- 2. Warning Verbal reprimand
- 3. Warning with written reprimand placed in personnel file
- 4. The following actions may be taken for disciplinary reasons by the District against a permanent CSEA employee for the causes listed in Section II (CSEA, Article 20.1.2., Cause:
 - 1) Dismissal—Dismissal is removal from the employment of the District.
 - 2) Suspension—Suspension is temporary removal from the employment of the District for a specified period of time *and without pay*.
 - 3) Involuntary Reassignment— Involuntary reassignment is a change of assignment whereby an employee is deprived of an incidence of classification.
 - 4) Involuntary Demotion Involuntary demotion is placement in a lower classification.
- 5. Further disciplinary action may be taken as reflected in 20.2 Cause and 20.3 Dismissal Procedure.

A certificated employee that fails to adhere to the procedures and practices of this plan shall be disciplined, per MPEA CBA Article XII.

Whenever an employee is disciplined, the site principals, afterschool program coordinator, department heads, and/or cabinet-level executives shall document the action taken.

COMMUNICATION WITH EMPLOYEES

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

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns by ensuring that supervisors and employees can communicate effectively in the employees' first language, including providing online modules in Spanish.
- Posted or distributed workplace violence prevention information.
- Employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action by using the CatapultK12 app.
- Below is a list of supervisors whom employees may immediately contact. In addition, should 9-1-1 need to be called, the phone system allows first responders to know the exact location of the emergency.
- 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.
- Site supervisors and/or Human Resources will investigate employees' concerns in a timely manner. Upon completion, the complainant will be informed of the results of the investigation and any corrective actions to be taken.
- Updates will be discussed and shared at monthly staff meetings and at quarterly WVPP committee meetings. The purpose of these meetings is to provide updates to the plan, discuss recent incidents, and coordinate training sessions, including sending copies of training materials and incident reports to other school sites.

MPESD will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee's supervisor or manager, who will inform Dr. Jewett. This will be accomplished by any medium of communication available or in-person meeting. If that's not possible, employees will report incidents directly to Dr. Jewett, the WVPP administrator.
- Evacuation and sheltering plans will be implemented. The maps of evacuation routes, locations of emergency exit and instructions for sheltering in place can be found here.

August Boeger Map | Ida Jew Valle Vista Map | Mt. Pleasant Ida Jew Map | Robert Sanders Map

- The procedure for reporting incidents, threats, hazards, and concerns of workplace violence can be done through CatapultK12 anonymous hotline, directly to their supervisor, or by contacting the HR office.
 - o Workplace Violence Reporting Hotline: (844) 408-0125
 - o **Workplace Violence Reporting Form:**https://drive.google.com/file/d/16v9oXpeUCiDGIe_Q4LFrv4y-MVBFqVG7/view
 - o Workplace Violence Log For Staff (where staff may submit Workplace Violence Logs): https://mobile.catapultems.com/mt-pleasant-sd/Internal

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. An employee who retaliates against a coworker for reporting an incident will be disciplined accordingly.

Employees should report any and all workplace violence related incidents, threats, and concerns to:

Sites:

Anthony Alvarado, Principal of IJA/VV AAlvardo@mpesd.org or at 408.599.0884

Jeannette Carson, Principal of Robert Sanders JCarson@mpesd.org or at 408.599.8980

Raquel Topete, Principal of August Boeger RTopete@mpesd.org or at 408.599.4657

Gilbert Rodriguez, Principal of MP/IJA <u>GiRodriguez@mpesd.org</u> or at 408.599.4237

Marisa Pena, Student Advisor of IJA/VV and August Boeger MPena@mpesd.org or at 408.531.5833

District Office:

Laurie Breton, Director for Student Services/Special Education Lbreton@mpesd.org or at 408.406.7977

Dina Chung, Director for Curriculum, Instruction and Assessment Dchung@mpesd.org or at 408.506.6550

Karissa Gire, Nurse – Districtwide KGire@mpesd.org or at 510.366.0361

Kevin Hutchings, Chief of Maintenance & Operations KHutchings@mpesd.org or at 408.219.0994

Tracy Huynh, Chief Business Officer THuynh@mpesd.org or at 408.599.0719

Dr. Sandra Jewett, Director for HR and IT Services Salewett@mpesd.org or at 408.559.0148

Lisa Kattenhorn, ELOP Coordinator <u>LKattenhorn@mpesd.org</u> or at 408.209.7758

Dr. Elida MacArthur, Superintendent EMacArthur@mpesd.org or at 669.333.2005

Daniel Patton, MPAS Coordinator

<u>DPatton@mpesd.org</u> or at 408.314.6406

Jessica Tejada, UPK/ECE Coordinator ITejada@mpesd.org or at 408.599-4277

Alex Heredia, IT Manager <u>AHeredia@mpesd.org</u> or at 408.476.2578

or by contacting emergency services directly by calling 9-1-1 if the threat/act of violence is imminent and serious.

When making a <u>report of workplace violence</u>, please include the following information (please note, workplace violence does not include lawful acts of self-defense or defense of others):

- 1. Date
- 2. Time
- 3. Location
- 4. Type of workplace violence:
 - a. Type 1 = Committed by a person who has no legitimate purpose at the worksite.
 - b. Type 2 = Committed by a person who does have a legitimate purpose at the worksite (customer, client, patient, student, inmate, or visitor).
 - c. Type 3 = Committed by a present or former employee, supervisor, or manager.
 - d. Type 4 = Committed by a person who does not work at the workplace, but has or is known to have had a relationship with an employee.
- 5. Circumstances at the time of the incident, including but not limited to the following:
 - a. Was the employee completing usual job duties?
 - b. Was the area poorly lit?
 - c. Was the work being "rushed"?
 - d. Was the employee working during a low staffing level?
 - e. Was the employee isolated/alone?

- f. Was the employee able to get help/assistance?
- g. Was the employee working in a community setting?
- h. Was the employee working in an unfamiliar/new location?
- i. Other: please explain
- 6. Classification of where the incident occurred:
 - a. At the workplace, indoors (please include building name and/or room number)
 - b. At the workplace, outdoors (please specify)
 - c. Other area (please explain)
- 7. Type of incident (including but not limited to):
 - a. Physical attack no weapon/object
 - b. Physical attack with a weapon/object
 - c. Threat of physical force or threat of use of a weapon/object
 - d. Sexual assault/threat (including rape, attempted rape, physical display, or unwanted verbal/physical sexual contact)
 - e. Other (please specify)

Employer's Evaluation & Response

The following policies and procedures are established and required to be conducted by MPESD to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.
- Review all submitted/reported concerns of potential hazards. These submittals/reports could be from the system the site/department supervisor had implemented for staff and authorized employee representatives to anonymously inform management about workplace violence hazards of threats of violence without fear of reprisal/retaliation. For example:
 - Daily or weekly review of all submitted and reported concerns
 - Workplace Violence Hazards suggestion box
 - Online form for reporting workplace violence hazards by using the CatalpultK12 app
 - Voicemail/email/text messages
 - Quarterly Exchange Thought Surveys
 - Staff meetings

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic Inspections shall be conducted monthly.

Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the following designated personnel in the following areas of the workplace:

Specific Person Name/Job Title	Area/Department/Specific location
Dr. Anthony Alvarado, Principal	Ida Jew Academy/Valle Vista
Ms. Jeannette Carson, Principal	Robert Sanders Elementary School
Mr. Gilbert Rodriguez, Principal	Mt Pleasant Elementary/Ida Jew Academy
Ms. Raquel Topete, Principal	August Boeger Middle School
Mr. Alejandro Heredia, IT Manager	Information Technology/District Office
Mr. Kevin Hutchings, Chief Maintenance & Operations	District and Site Surveillance Measures
Ms. Tracy Huynh, Chief Business Officer	District and Food Services Dept
Mrs. Laurie Breton, Student Services/Special Education Director	District and Special Education Programs at the various school sites

The <u>Tier II-School Vulnerability & Security Risk Assessment Report</u> was prepared by the Security Assessment Team from Knowledge Save Lives, Inc., which reviewed the campuses at Mt. Pleasant Elementary School, Ida Jew/Valle Vista Schools, and August Boeger Middle School and provided evidence-based solutions and recommendations to mitigate security deficiencies and vulnerabilities.

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including prohibiting employees from confronting persons committing a criminal act or violent persons.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area they can go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes, badge readers, security windows, physical barriers, and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., P.A. system.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- How well our establishment's management and employees communicate with each other.
- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.

- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

Workplace Violence Hazard Correction

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

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. The San Jose Police Department will be contacted to ensure that employees are provided with the necessary protection.
- All corrective actions taken will be documented and dated on the appropriate forms, including the procedures taken to correct the actions.
- Corrective measures for workplace violence hazards include, but are not limited to, the following:
 - o Improve lighting around and at the workplace.
 - o Post of signs notifying the public that all visitors must check-in before entering the site.
 - o Maintain supervision of the facilities with 24/7 cameras.
 - O Utilize surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
 - o Security surveillance cameras are placed in and around the workplace.
 - o Provide workplace violence systems, such as door locks, violence windows, physical barriers, emergency alarms, and restraint systems.
 - o Ensure the adequacy of workplace violence systems.
 - o Post emergency telephone numbers for law enforcement, fire, and medical services
 - o Control access to, and freedom of movement within, the workplace by non-employees, include recently discharged employees or persons with whom one of our employees is having a dispute.
 - o Utilize the internal PA system to warn others of violence, danger, or to summon assistance.
 - o Ensure employees have access to a telephone with an outside line. Provide employee training/re-training (refreshers) on the WVPP, which could include but not limited to the following:
 - Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
 - Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
 - Improve how well our establishment's management and employees communicate with each other.
 - Procedures for reporting suspicious persons, activities, and packages.

- Provide/review employee, supervisor, and management training on emergency action procedures.
- Ensure adequate employee escape routes.
- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence by providing annual training.
- Ensure that employee disciplinary and discharge procedures address the potential for workplace violence, including utilizing virtual conference meetings to discuss potentially volatile subjects.
- Board Policy 5137.7 prohibits weapons on campus.
- Limit the amount of cash on hand and use time lock safes for large bills.
- Provide procedures for a "buddy" system for specified emergency events.

<u>Procedures for Post-Incident Response and Investigation</u>

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

- Visit the scene of an incident as soon as it is safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The <u>violent incident log</u> will be used for every workplace violence incident and will include information, such as:
 - ✓ The date, time, and location of the incident.
 - ✓ The workplace violence type(s) involved in the incident.
 - ✓ A detailed description of the incident.
 - ✓ A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
 - ✓ 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.
 - ✓ A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - ✔ 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, hairpulling, kicking, punching, slapping, pushing, pulling, scratching, or

- spitting.
- Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
- Threat of physical force or threat of the use of a weapon or other object.
- Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- Animal attack.
- Other.
- ✓ Consequences of the incident, including, but not limited to:
 - Whether security or law enforcement was contacted and their response.
 - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
 - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents.
- Other post-incident procedures:
 - o Support and resources, such as counseling services, are provided to affected employees. These resources could include referrals to counseling services, information about employee assistance programs, and time off work if necessary.

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

TRAINING AND INSTRUCTION

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

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

MPESD will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

- A soft copy of MPESD's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement

without fear of reprisal.

- Workplace violence hazards specific to the employees' jobs, the corrective measures MPESD
 has implemented, how to seek assistance to prevent or respond to violence, and strategies to
 avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- Opportunities MPESD has for interactive questions and answers with a person knowledgeable about the MPESD plan.
- Strategies to avoid/prevent workplace violence and physical harm, such as:
 - o How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
 - o Ways to defuse hostile or threatening situations.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
- Employee routes of escape.
- Emergency medical care provided in the event of any violent act upon an employee.
- Post-event trauma counseling for employees desiring such assistance.

Employee Access to the Written WVPP

Each school site and/or department ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by the following:

- Whenever an employee or designated representative requests a copy of the written WVPP, we will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.
- We will provide unobstructed access through a district server or website, which allows an employee to review, print, and email the current version of the written WVPP. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or co-employees.

Recordkeeping

MPESD will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Create and maintain training records for a minimum of one (1) year and include the following:
 - o Training dates.
 - **o** Contents or a summary of the training sessions.
 - o Names and qualifications of persons conducting the training.
 - o Names and job titles of all persons attending the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.

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

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

Employee Access to Records

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

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

Review and Revision of the WVPP

The WVPP will be reviewed for effectiveness:

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

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

Review of MPESD's WVPP should include, but is not limited to:

- Review of incident investigations and the violent incident log.
- Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).
- Review that violence risks are being properly identified, evaluated, and corrected. Any
 necessary revisions are made promptly and communicated to all employees. These revisions
 could involve changes to procedures, updates to contact information, and additions to
 training materials.

EMPLOYER REPORTING RESPONSIBILITIES

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

I, Sandra Jewett, Director, Personnel & IT Services of MPESD, hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to promoting a culture of safety and violence prevention in our workplace and believe that these policies and procedures will help us achieve that goal.

Dr. Sandra Jewett	
Signature of person authorizing this WVPP	Date of Signature

WORKPLACE VIOLENCE REPORTING FORM

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

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

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

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

WORKPLACE VIOLENCE REPORTING FORM

THIS FORM IS TO BE USED BY EMPLOYEES THAT HAVE IDENTIFIED AN INCIDENT, THREAT OR CONCERN RELATED TO WORKPLACE VIOLENCE. THIS FORM BRINGS THE ISSUE TO THE ATTENTION OF THE MANAGEMENT.

IT IS ILLEGAL FOR THE EMPLOYER TO TAKE ACTION AGAINST AN EMPLOYEE FOR MAKING SUCH A REPORT. THE EMPLOYER MUST INVESTIGATE THE REPORT AND EXPLAIN TO EMPLOYEES THE ACTION TAKEN AND ANY SUBSEQUENT ACTIONS, AS NECESSARY.

To be completed by the individual investigating the incident. Return completed form within 2 days following incident to Dr. Sandra Jewett, HR/IT Services Department. Attach witness statements to this form.

Report Submitted By:				Date:	
General Description:			1	Phone:	
			<u>'</u>		
Date of Incident:			Time:		
Address/Location of Incid	dent:				
ndividuals involve	ed in the incident (us	e add	itional sheet((s) if necessary)	
Name:		Name	:		
Victim or Assailant: Victim or Assailant:			Assailant:		
Job Title:			Job Title:		
Department:		Depar	tment:		
Phone:		Phone	:		
Immediate Supervisor:		Imme	diate Supervisor:		
Classification of In	cident (Select One)				
• Type 1 • Type 2		•	Type 3	• Type 4	
Committed by a person who has no legitimate purpose at the worksite.	Committed by a person who does have a legitimate purpose at the worksite	or for	nitted by a present mer employee, visor, or manager.	Committed by a person who does not work at the workplace but has or is known to have had a relationship with an employee.	

Classification of Incident Location (Select One)

At Workplace, Indoors (Please Include	At Workplace, Outdoors	Other Area (Please Explain)
Bldg. Name/Room No.)	(Please Specify)	

Type of Incident

Physical Attack – no weapon/object
Physical Attack – with weapon/object
Threat of physical force and/or threat of use of a weapon/object
Physical Assault - Hitting, fighting, pushing, or shoving
Sexual assault/threat (incl. rape, attempted rape, physical display, or unwanted verbal/physical sexual contact)
Animal Attack
Other (specify)

How was the incident communicated? (Circle one or more)

Communicated directly to victim	Verbal	Mail	Note	Email
Communicated to another person	Verbal	Mail	Note	Email
Other (specify)				

Initial Response or Follow up Activity: (Circle all that apply)

Situation defused	Occupational Medicine notified
Security called	Law Enforcement notified If Yes, Name of Agency and Report Number:
Fire Department notified	Paramedics called

First Aid Received?	Employee Assistance Program Resources Provided?
Other (specify)	

Describe Incident in Detail <i>Include what happened, where, who was involved, what you heard, saw, etc. Also include the circumstances at</i>
time of incident (i.e.: was the employee completing usual job duties, was the area poorly lit, was the work being rushed, was the employee working during a low staffing level, was the employee isolated/alone, was the
employee able to get help/assistance, was the employee working in a community setting, was the employee working in an unfamiliar/new location, other – please explain). Please continue on separate sheet of paper if
necessary.
List Names of Other Witnesses
List Names of Other Witnesses

Did the severity of the injuries require reporting to (was done, along with the name of the Cal/OSHA rep	
Signature	Date
Person Receiving Witness Statement	Date
Routing	

Yes	No	Name	Signature	Date
		Supervisor/Administrator		
		Site/Department		

Upon completion of investigation, attach a findings/follow-up document to this form.

GENERAL SAFETY TRAINING RECORD LOG

SUBJECT COVERED	
LOCATION OF TRAINING:	
DATE OF TRAINING:	NAME & QUALIFICATIONS OF TRAINER: (Years of related experience, designations, certifications, etc.)
EMPLOYEES NAME/TITLE/DEPARTMENT (prin	nt) SIGNATURE

Copy to Dr. Sandra Jewett, HR & IT Services Director (FOR WVPP RECORDKEEPING)

Mt. Pleasant Elementary School District WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION FORM

Site:	Date of Survey:
Person Completing:	

Inspections shall be conducted:

- 1. when the plan is first established
- 2. after each workplace violence incident
- 3. whenever the employer is made aware of a new or previously unrecognized hazard
- 4. periodically: inspections of workplace violence hazards will identify unsafe conditions and work practices

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including our
 policy prohibiting employees, who are not security guards, from confronting persons
 committing a criminal act or violent persons.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area they can go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes, badge readers, security windows, physical barriers, and restraint systems.

- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Employees' skill in safely handling threatening or hostile service recipients (example: security guards).
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- How well our establishment's management and employees communicate with each other.
- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
- Other procedures to identify and evaluate workplace violence hazards state below: