

COLTON JOINT UNIFIED SCHOOL DISTRICT

Workplace Violence Prevention Program

The District's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

DEFINITIONS

Clients – herein used to refer to students, parents, community members, visitors

Supervisors – herein used to refer to Principal, AP, Managers, Director

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.

RESPONSIBILITY

Assistant Superintendent of Student Services or designee is the WVPP administrator for the district and has the authority and responsibility for implementing the provisions of this plan.

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas (e.g., break/lunchroom in “Right to Know” folder) and for answering employee questions about the WVPP.

EMPLOYEE ACTIVE INVOLVEMENT

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

- Management will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence.
 - Management will have monthly safety meetings with employees and their representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.
 - 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.
 - Reporting and investigating workplace violence incidents:
 - All incidents shall be reported to the reporting staff member’s immediate supervisor

- Immediate supervisor shall notify the WVPP administrator via incident log
 - Employee or Immediate Supervisor completes a WVPP incident form.
 - Immediate supervisor shall investigate the incident on the WVPP Investigation Report
 - Immediate supervisor informs the WVPP administrator of the findings
 - WVPP and Immediate Supervisor will work on corrective actions.
 - Immediate Supervisor will follow up with employee on the WVPP Post-Investigation form.
- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. 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, by following the District Code of Safe Practices.
 - 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.

EMPLOYEE COMPLIANCE

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

- Training employees and supervisors in the provisions of The District Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP, through training and observation.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace, may include emails, announcements, certifications, etc.
- Per BP 4118 and Collective Bargaining Agreements, discipline employees for failure to comply with the WVPP will follow the District's existing discipline process.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our supervisors, 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 Program Training.
- Workplace violence prevention training programs (ASCIP).
- Regularly scheduled staff and safety committee meetings that address security issues and potential workplace violence hazards (Principal Meetings; Executive Leadership Team meetings)
- Posted or distributed workplace violence prevention information (website; posters; email; site breakrooms; “Right to Know” binder; Principal Meetings; Executive Leadership Team meetings).
- 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:
 - Employees can without the fear of reprisal report a violent incident, threat, of other violence concerns (WeTip).
 - Provide contact information for who to call for emergency response.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees’ concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken.
 - Updates on the status of investigations and corrective actions are provided to employees through email and at safety meetings, as appropriate. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.
 - Updates during daily/weekly/monthly/quarterly meetings with other departments in the building (at or near and around the same worksite) to discuss the plan and any updates. These meetings could involve sharing updates to the plan, discussing recent incidents, and coordinating training sessions. (Note: implementation committee should be established to discuss and share updates and changes.)
 - Sharing training materials and incident reports with other departments to ensure a coordinated response to any incidents. This could involve sending copies of training materials and incident reports to other departments.

COORDINATION WITH OTHER EMPLOYERS

Upon request, the District will provide a copy of its WVPP to outside contractors.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

The District 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 the WVPP administrator. If that's not possible, employees will report incidents directly to the WVPP administrator, or designee.
- Employees can report incidents to their supervisor, Human Resources (HR), or directly to the WVPP administrator.
- Any workplace violence can be reported using the WVPP Reporting Form (Google Form or

Electronic form). Form will be made available to all employees on the district website and CJUSD Intranet.

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 may face elevated levels of progressive discipline.

EMERGENCY RESPONSE PROCEDURES

The District has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following:
 - Alarm systems, Public Address (PA) announcements, and other means of communication will be used to alert employees of emergencies (The alarms could be audible alarms, visual alarms, or both.)
 - Using brief messaging in simple, easy to understand/common words or phrases (excluding codes and acronyms)
 - The District/schools will have emergency plans. The plans include maps of evacuation routes, locations of emergency exit, and instructions for sheltering in place and lockdowns.
- The district/schools will have a plan to obtain help from staff, security personnel, or law enforcement, including contact information for response staff and local law enforcement and post in common areas. This information includes phone numbers, email addresses, and physical locations. If there is immediate danger, call for emergency assistance by dialing 9-1-1, and then notify the immediate supervisor and/or the WVPP Administrator.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted 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:
 - Regular review of all submitted and reported concerns contained in the WVPP log (NOTE: add in “Workplace violence hazard potential” on the WVPP reporting form)
 - Voicemail/email/text messages or other resources, such as WeTip

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 at least annually, by designated personnel.

Inspections for workplace violence hazards may include, but are not limited to, assessing:

- The exterior and interior of the workplace for its effectiveness against intrusion.
- The need for utilizing violence surveillance measures, such as mirrors and cameras.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency contact information for law enforcement, fire, and medical services.
- Whether employees have the ability to communicate with outside entities during the loss of electricity or an emergency.
- Whether employees have effective and safe escape routes from the workplace.
- Whether employees have a designated safe area where they can go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or 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 and knowledge in safely handling threatening or hostile service recipients.
- 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.
- How effectively 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 hazards that may increase the risk of workplace violence will be evaluated and corrected in a timely manner. The District will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation, except

those necessary to correct the existing condition. Employees correcting the hazardous condition will be provided with the necessary protection.

- All corrective actions taken will be documented and dated on the appropriate forms, including the Violent Incident Logs, if appropriate.
- Corrective measures for workplace violence hazards will be specific to a given work area and the designated department supervisor will be responsible for the appropriate follow up:
 - Make the workplace unattractive to unauthorized visitors by:
 - Improve lighting around and at the workplace.
 - Post of signs notifying the public of available surveillance measures to monitor facilities.
 - Utilize *available* surveillance measures to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
 - Utilize the available Safety and Security personnel to patrol the workplace interior and perimeter.
 - Provide workplace violence systems, such as door locks, violence windows, physical barriers, emergency alarms and restraint systems
 - Ensure the adequacy of workplace violence systems
 - Post signage for the WVPP and telephone numbers for emergency services.
 - Control access to and freedom of movement within the workplace by non-employees, include recently discharged employees or persons with whom one of our employees is having a dispute.
 - Utilize effective systems to warn others of a violent danger or to summon assistance, e.g., alarms or panic buttons – Cisco phone system; Google Chat; all-call at school sites
 - 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 the district
 - 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 the district’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 (emergency drills log; Raptor; calendar appointments)
- Ensure adequate employee escape routes (create or update?)
- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence. This will be achieved through training, emails, and announcements.
- Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.
- Establish a policy for prohibited practices – Follow existing Board Policy 4119.21, 419.21, and 4319.21 for professional and/safe behavior.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or the immediate supervisor of the complainant will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings on the WVPP incident report and ensuring corrective actions are taken and reported on the WVPP incident log.
- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, such as:
 - The date, time, and location of the incident.
 - The workplace violence type or types 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, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - Animal attack.
 - Other.
- 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.
- Support and resources, such as counseling services, are provided to affected employees referrals to counseling service; providing information about the Employee Assistance Program [EAP], and time off work if necessary.
- Consequences for students

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

TRAINING AND INSTRUCTION

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

- When the WVPP is first established.
- Annually to ensure all employees understand and comply with the plan.
- 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.

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

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Opportunities the District has for interactive questions and answers with a person knowledgeable about the District plan.
- Strategies to avoid/prevent workplace violence and physical harm, such as:
 - How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
 - 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.
- Emergency medical care provided in the event of any violent act upon an employee
- Post-event trauma counseling for employees desiring such assistance.

Note: *The District will provide training through the ASCIP E-learning platform at the beginning of each school year and other mandatory trainings.*

EMPLOYEE ACCESS TO THE WRITTEN WVPP

The District ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This can be accomplished by placing a physical copy of the plan in the lounge at all sites within the "Right to Know" binder. The WVPP can also be found on the district's website, district intranet, or upon request.

RECORDKEEPING

The District will:

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

- Create and maintain training records for a minimum of one (1) year and include the following (provided by ASCIP):
 - Training dates.
 - Contents or a summary of the training sessions.
 - Names and qualifications of persons conducting the training.
 - 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 [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

EMPLOYEE ACCESS TO RECORDS

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

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

REVIEW AND REVISION OF THE WVPP

The District WVPP will be reviewed for effectiveness:

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

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

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

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Dr. Anthony Ortiz	Assistant Superintendent, Student Services	Overall responsibility for the plan	(909) 580-6523	anthony_ortiz@cjuds.net
Mary Doublet	Director, Risk Management	Responsible for employee involvement and training	(909) 580-6611	mary_doublet@cjuds.net
John Sachs	Director, Safety & Security	Responsible for emergency response, hazard identification, and coordination with other employers	(909) 580-6549	john_sachs@cjuds.net

Any person who knows of or suspects a workplace violence and hazard exists or could potentially create a problem should contact one of the individuals above.

Assistant Superintendent, Student Services

I, Dr. Anthony Ortiz, Assistant Superintendent of Student Services, in the Colton Joint Unified School District, 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 ensuring the safety and well-being of our employees and believe that these policies and procedures will help us achieve that goal.

Anthony Ortiz, Assistant Superintendent, Student Services



September 26, 2024