Workplace Violence Prevention Plan

Sequoia Union High School District
480 James Ave
Redwood City, CA 94062

District Office
480 James Ave
Redwood City, CA 94062

July 1, 2024

As a result of California Senate Bill 553 (SB 553), all employers that fall within the scope of California Labor Code (LC) 6401.7 and LC 6401.9 , are required to establish, implement, and maintain an effective, written Workplace Violence Prevention Plan (WVPP) no later than July 1, 2024.

TABLE OF CONTENTS

1.	Workplace Violence Policy	4
2.	Definitions	4
3.	Scope	6
4.	Compliance	6
5.	Communication	7
6.	Reporting Concerns of Workplace Violence	7
7.	Post-Incident Response and Investigation	8
8.	Identifying Workplace Violence Hazards	8
9.	Correcting Workplace Violence Hazards	9
10.	Workplace Violence Emergencies	9
11.	Incident Response and Recovery	9
12.	Workplace Violence Prevention Training	10
13.	Employee Involvement	11
14.	Employee Access to the WVPP	11
15.	Recordkeeping	12
16.	Other Considerations	12
18.	WVPP Review Cycle	14
19.	WVPP Ownership and Administration	14
	Attachment A	16
	Workplace Violence Hazard Self-Assessment	16
	Attachment B	16
	Violent Incident Log	16
	Attachment C	16
	Workplace Violence/Hazard Correction Form	16

1. Workplace Violence Policy

Sequoia Union High School District or SUHSD, will not tolerate workplace violence and is committed to maintaining a safe workplace for all employees, supervisors, managers, vendors, contractors, and visitors. The workplace is defined as any time or place when on School District business, at a School District sponsored event, or if the conduct has an impact on the workplace, regardless of where the conduct occurs.

Prohibited actions include, but are not limited to, the following types of behaviors:

- Striking, punching, slapping, or assaulting another person
- Throwing or kicking objects
- Direct or implied threat to do harm to a person or to a property
- Threatening or intimidating communications or gestures
- Expression of a plan to hurt self/others
- Possession of a dangerous, deadly weapon (including imitation weapons) at the workplace, unless an employee has been authorized in advance
- Inappropriate behavior, statements, or actions that could reasonably be perceived as aggressive, threatening, or violent.

2. 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 is required by LC section 6401.9.

Plan - The workplace violence prevention plan is 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 that are used to effectively reduce workplace violence

3. Scope

The WVPP applies to all employees, contractors, consultants, vendors, suppliers, temporary employees, partners, contingent workers, authorized third parties, affiliates, or other individuals engaged in business activities with or on behalf of Sequoia Union High School District.

4. Compliance

Employees who violate the elements of WVPP may be subject to disciplinary action, up to and including termination of employment. Appropriate corrective action will also be taken in the event a non-employee violates this policy or otherwise engages in unacceptable behavior, including the termination of any business dealings between the non-employee and SUHSD.

- Training employees, supervisors, and managers in the provisions of Sequoia Union High School District Workplace Violence Prevention Plan (WVPP)
- Provide retraining to employees if needed
- Encouraging reporting to the person(s) identified, supervisor, or managers
- Making the plan available to staff which includes information about reporting violence and threats
- Debriefing of incidents
- Discipline employees for failure to comply with the WVPP in accordance with Board Policies and Administrative Regulations 4118, 4218, and 4318.

Any contractors and vendors working for SUHSD are required at a minimum to attest that they are in compliance with the elements of SB 553 Workplace Violence Prevention Plan before contractors or vendors commence work. Failure to provide all necessary information and paperwork could result in a delay of the work start date.

The following will be provided:

- Vendor contracts will provide an attestation of compliance with SB 553

5. Communication

SUHSD recognizes that to help maintain a safe, secure workplace we must communicate to employees regarding workplace safety and security issues. We have a communication system designed to encourage a continuous flow of safety and security information between management and our employees without fear of reprisal and in a form that is easily

understandable and in a language they understand. We will communicate information regarding workplace safety and security through:

- New employee orientation
- Workplace violence prevention training programs
- Newsletters, intranet, and e-mail
- Posters/Flyers
- Staff meetings
- Department meetings

6. Reporting Concerns of Workplace Violence

Employees should report any behavior perceived as intimidating, threatening, or violent (even when no actual threat or violent act occurs) that is job-related, takes place on SUHSD property, is connected to SUHSD employment, or has the potential to be brought into or on SUHSD property; regardless of the relationship between the individual who initiated it and the person(s) threatened.

- For any emergency or life-threatening situation, CALL THE POLICE (911)
- Report all threats or acts of workplace violence to your supervisor or manager. If that is not possible, you may report incidents to another SUHSD supervisor or manager.
- Employees can report incidents to their direct supervisors
- For every workplace violent incident, the Site Coordinator shall complete a Workplace Violent Incident Report and provide it to the Assistant Superintendent of Human Resources.
- Any person wishing to remain anonymous may use our confidential reporting service to share their concerns Say Something Anonymous Reporting System https://www.seq.org/DEPARTMENTS/Student-Services/Safety/Say-Something-Anonymous-Reporting-System/index.html

SUHSD will not retaliate against anyone for reporting a concern in good faith, assisting in making a report, or cooperating in a related investigation. Furthermore, supervisors and managers should be alert for signs of retaliation and report them immediately to Human Resources, if observed.

7. Post-Incident Response and Investigation

All threats or acts of violence that SUHSD is made aware of will be investigated to protect employees from potential harm. Procedures for investigating incidents of workplace violence will include:

- Visiting the scene of an incident as soon as possible
- Interviewing involved parties, injured, threatened employees, and witnesses.
- Examining the workplace for security risk factors associated with the incident, including any reports of inappropriate behavior by the perpetrator
- Determining the cause of the incident

- Review security footage of existing security cameras if applicable
- Detailed description of the event
- Consequences of the incident, including, but not limited to; whether security or law enforcement was contacted, their response, and actions taken to protect employees from a continuing threat or from any other hazards identified because of the incident.
- Implementing mitigating actions to prevent incidents from recurring.
- Recording the findings, implementing mitigating actions, and policy changes.
- Employee support resources such as counseling services which are provided to affected employees

Sequoia Union High School District will inform the reporting individual of the results of the investigation (Workplace Violent Incident Log). SUHSD will maintain the confidentiality of the reporting employee and the investigation but may need to disclose results in appropriate circumstances; for example, to protect individual safety.

8. Identifying Workplace Violence Hazards

SUHSD to review all submitted/reported concerns of potential hazards.
SUHSD will perform periodic assessments to identify and evaluate workplace violence hazards and threats of workplace violence. Assessments will also be performed on the following schedule:

- When the WVPP is first established;
- After a workplace violence incident;
- Whenever SUHSD is made aware of a new or previously unrecognized hazard.

9. Correcting Workplace Violence Hazards

SUHSD will immediately address workplace violence hazards that expose employees to imminent danger of death or serious injury. Serious workplace violence hazards that have a possibility of causing death or serious injury to an employee must be addressed within seven [7] days. All other hazards must be addressed in a timely manner. When a corrective measure cannot be implemented within this timeframe, SUHSD shall take interim measures to abate the imminent or serious nature of the hazard while implementing the permanent control measures. Corrective measures for workplace violence hazards will be specific to a given work area. All corrective actions taken will be documented and dated on the appropriate forms.

10. Workplace Violence Emergencies

In the event of an actual or potential workplace violence emergency, the District Office will alert employees of the presence, location, and nature of the workplace violence through the following methods:

- Intercom, text message, and/or activation of alarm

- The District Office has an evacuation and sheltering plans.
- The District uses standardized emergency language based on the San Mateo Office of Education's Big Five Immediate Action Response protocols:
    - Shelter in Place
    - Drop, Cover, and Hold On
    - Secure Campus
    - Lockdown Barricade
    - Evacuation

Employees can obtain help from staff assigned to respond to workplace violence emergencies, such as supervisors, security, or law enforcement personnel by calling the following number: 650-369-1411. If no security personnel are located at the worksite, employees shall call 911 to report the incident and request assistance from law enforcement.

11. Incident Response and Recovery

SUHSD has developed procedures to guide the response to incidents of workplace violence. These include the following as appropriate:

- Secure the location to safeguard evidence and reduce distractions during the post-incident response process.
- Assure that injured employees receive prompt and appropriate medical care. This includes but is not limited to, providing transportation of any injured persons to medical care. Prompt first aid and emergency medical treatment can minimize the harmful consequences of a violent incident.
- Report the incident to the appropriate authorities as required by applicable laws policies, and regulations.
- Assure that an incident report is completed immediately after an incident occurs, noting details that might be forgotten over time.
- Address the need for appropriate treatment for employees who were victims of workplace violence. In addition to physical injuries, victims and witnesses may suffer psychological trauma, fear of returning to work, feelings of incompetence, guilt, powerlessness, and fear of criticism by supervisors or managers.
- Determine if corrective measures developed under this plan were effectively implemented; solicit feedback from all personnel involved in the incident as to the cause of this incident and if injuries occurred, how injury could have been prevented; and
- Record the incident on the Workplace Violent Incident Log.

12. Workplace Violence Prevention Training

Training will be provided to all new/current employees, supervisors, and managers on an annual basis, if they change roles, or if new workplace hazards are identified or the plan changes. The extent and depth of training will vary depending on position, but the following topics will be included at a minimum:

- Definition of workplace violence.
- Risk factors that can cause or contribute to threats and violence.
- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in the 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.
- 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 SUHSD has for interactive questions and answers with a person knowledgeable about the specific 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.
- Workplace violence hazards specific to the employees' jobs, the corrective measures SUHSD has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid it.
- Recognition of warning signs of problematic behavior.
- Policies and procedures for reporting and recordkeeping.
- A response plan for violent situations, including availability of assistance, response to alarm systems, and communication procedures.

13. Employee Access to the WVPP

SUHSD 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:

- 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 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 electronic means to communicate with management or co-employees.

Recordkeeping

The following records shall be maintained according to the following retention schedule:

- Hazard Identification, Evaluation, and Correction for five (5) years
- Violent Incident Logs for five (5) years
- Incident Investigations for five (5) years
- Training records - which should include dates that training was conducted, type of training given, employees trained, etc. for one (1) year

14. Other Considerations

In keeping with our objective to maintain a safe and secure workplace, employees and managers should note:

- Nothing in this WVPP discourages or precludes an employee, co-worker, supervisor, or manager from taking emergency action, e.g., calling 911 for police, fire, or emergency medical response, if deemed necessary to ensure the safety of employees, contractors, or visitors.
- Exceptions to this policy should be made, if necessary, to mitigate a threat from being carried out or a violent act from occurring.
- We respect employees' right to privacy and will maintain confidentially to the extent allowed by law unless doing so would result in physical harm to any person and/or impact the overall safety of the workplace.

15. Employer Reporting Responsibilities

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, SUHSD 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.

16. WVPP Review Cycle

The WVPP shall be reviewed annually by the site coordinator. When revisions or enhancements are not required, the review must be noted in the Change Log of the WVPP to indicate a review has been conducted and by whom.

Version	Date	Description	By:
1.0		Initial Release	

17. WVPP Ownership and Administration

Workplace Violence Prevention Plan Site Coordinator

The Assistant Superintendent of Human Resources is the designated WVP Site Coordinator and has the authority and responsibility for developing, implementing, and maintaining this plan and

conducting or overseeing any investigations of workplace violence reports. The Assistant Superintendent of Human Resources will also be able to answer employee questions concerning this plan.

The Assistant Superintendent of Human Resources shall solicit feedback and input from employees and their authorized representatives in developing and implementing the WVP plan. Active involvement of employees could include, but is not limited to, their participation in identifying, evaluating, and correcting workplace violence hazards; in designing and implementing training; and in reporting and investigating workplace violence incidents.

Workplace Violence Prevention Plan Program Administrator

The Assistant Superintendent of Human Resources is the designated District Wide WPV Program Administrator and has the authority and ultimate responsibility for developing, implementing, and maintaining this plan and overseeing any investigations of workplace violence reports. The Assistant Superintendent of Human Resources will also be able to answer employee questions concerning this plan.

Signature: 

Name: Todd Beal

Title: Assistant Superintendent, Human Resources

Date: July 1, 2024