

WORKPLACE VIOLENCE PREVENTION PLAN



District Office	Green Hills Elementary	Lomita Park Elementary	Meadows Elementary	Spring Valley Elementary	Taylor Middle School
555 Richmond Drive Millbrae, CA 94030	401 Ludeman Lane Millbrae, CA 94030	200 Santa Helena Ave. San Bruno, CA 94066	1101 Helen Drive Millbrae, CA 94030	817 Murchison Drive Millbrae, CA 94030	850 Taylor Blvd. Millbrae, CA 94030

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 no later than July 1, 2024.

1. WORKPLACE VIOLENCE POLICY

The Millbrae Elementary School District 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.

Millbrae Elementary School District prohibits and will not tolerate any form of workplace violence by any employee or third party, including employees, vendors, visitors, parents, students, or others, either on any District property or at any District-sponsored events.

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 property
- Threatening or intimidating communications or gestures
- Expression of plan to hurt self/others
- Possession of a dangerous, deadly weapon (including imitation weapons) at the workplace, unless an employee has been authorized by an administrator in advance
- Inappropriate behavior, statements, or actions that could reasonably be perceived as aggressive, threatening, or violent

The Millbrae Elementary School District shall provide all safeguards required by law and regulation, including the provision of personal protective equipment and training at no cost to the employee, at a reasonable time and place for the employee, and during the employee's paid time.

The primary objective of the Workplace Violence Prevention Plan ("WVPP") is to prevent and/or eliminate workplace violence as follows:

- Establish and maintain an effective WVPP
- Provide a safe working environment
- Establish policies, training, and communications to improve workplace violence prevention
- Provide written records of workplace violence incidents and investigations, in accordance with the Plan

The Millbrae Elementary School District hereby authorizes and ensures the establishment, implementation, and maintenance of this Plan and the documents/forms within this Plan. The District is committed to a culture of safety and violence prevention. These policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety of Millbrae Elementary School District employees.

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.

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

Log - The [violent incident log](#) required by LC section 6401.9.

Plan - The WVPP 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, including, but is not limited to, the following: (i.) 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; (ii.) 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; and (iii.) the following four workplace violence types:

A. **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.

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

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

D. **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.

OPTIONAL DEFINITIONS

Alarm: a mechanical, electrical, or electronic device that does not rely upon an employee's vocalization in order to alert others.

Environmental risk factors: factors in the facility or area in which services or operations are conducted that may contribute to the likelihood or severity of a workplace violence incident, including, but not limited to, risk factors associated with the specific task being performed, such as the collection of money.

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 Millbrae Elementary School District.

This WVPP is intended to supplement the Millbrae Elementary School District's Comprehensive School Safety Plan developed pursuant to Education Code § 32281 and the Injury and Illness Prevention Program ("IIPP") required by 8 CCR § 3203. This Plan is in effect at all times in all work areas and is intended to be specific to the hazards and corrective measures for each work area and operation.

4. COMPLIANCE

The Millbrae Elementary School District is committed to ensuring that all safety and health policies and procedures involving workplace security, including this plan, are clearly communicated and understood by all employees.

All employees are responsible for using safe work practices, for following all directives, policies, and procedures, including this plan, and for assisting in maintaining a safe and secure work environment. Failure to follow this Plan, IIPP, Comprehensive School Site Safety Plan, or any other applicable Millbrae Elementary School District directives, policies, or procedures is grounds for discipline, up to and including termination. Managers and supervisors will enforce this plan fairly and uniformly.

In addition to methods provided in other sections of this plan, the Millbrae Elementary School District's system to ensure that employees, including supervisors and managers, comply with this plan and 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, those listed below:

- Making this plan available to employees and authorized employee representatives. When an employee or their authorized bargaining representative requests a copy of this plan, Millbrae Elementary School District shall provide the requester with a printed copy unless the requester agrees to accept an electronic copy of the plan.

- Training employees, supervisors, and managers in the provisions of Millbrae Elementary School District (WVPP) and any necessary re-training, including retraining for any employee whose safety performance is deficient.
- Effective procedures and annual training to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace.
- Discipline employees for failure to comply with the WVPP, IIPP, Comprehensive School Site Safety Plan, and/or workplace security practices.
- Periodic inspections of the school site in accordance with the “Hazard Identification, Evaluation and Correction” section of this plan.

5. OPTIONAL COMPLIANCE PROCEDURES

- Providing employees with unobstructed access through a server or [website](#), which allows an employee to review, print, and email the current version of this plan. 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.
- Conducting periodic safety committee meetings/employee meetings. All meetings should be documented, including, but not limited to, signed attendance rosters, the name and title of the personnel conducting the meeting, an agenda for items discussed, and minutes of the meetings.
- Any contractors and vendors working for Millbrae Elementary School District are required at a minimum to attest to their compliance with all 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 contain an attestation of compliance with SB 553.

6. COMMUNICATION

Millbrae Elementary School District recognizes that to help maintain a safe, healthy, and secure workplace, it must have open two-way communication between all employees, including teachers, managers and supervisors, and other employees on all workplace safety, health, and security issues. The Millbrae Elementary School District’s communication procedures are designed to encourage and facilitate a continuous flow of information between management, employees and other employees regarding any suggestions, concerns, or information relating to health, safety or security issues, without fear of reprisal and in a form that is readily understandable by all affected employees.

The Millbrae Elementary School District will ensure that all workplace violence policies and procedures within this plan are clearly communicated to and understood by all employees, including any revisions to the plan, in accordance with the “Plan Review” section of this plan.

All employees may communicate suggestions, concerns, or information regarding workplace violence either directly to their supervisor or manager or in accordance with the “Reports of Workplace Violence” and/or “Law Enforcement” sections of this Plan.

No employee will be subject to any discipline, retaliation or reprisal for reporting or communicating regarding workplace violence or any injury resulting from workplace violence.

We will communicate information regarding workplace safety and security through:

- New employee orientation
- Training and re-training programs as provided in the plan (Copy of WVPP included in annual Target Solutions training)
- Workplace violence prevention training programs
- Newsletters, intranet, and e-mail
- Posters/Flyers
- Staff meetings
- Department meetings

7. 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 Millbrae Elementary School District property, is connected to Millbrae Elementary School District employment, or has the potential to be brought into or on Millbrae Elementary School District property; regardless of the relationship between the individual who initiated it and the person(s) threatened. [Click here to report.](#)

Emergency Situations:

- For any emergency or life-threatening situation, get to safety and CALL THE POLICE (911) when it is safe to do so.

Non-Emergency Situations

- Report all threats or acts of workplace violence to your supervisor or manager. If that is not possible, you may [report incidents](#) to the Site Principal, Director of Human Resources or the District Superintendent.
 - Any person receiving a report of workplace violence shall forward it to the Director of Human Resources.
 - The Director of Human Resources shall accept and respond to reports of workplace violence, as described in this plan. In addition to reviewing the Violent Incident Report Form, the Director of Human Resources is responsible for recording information relating to each occurrence of workplace violence.
 - If workplace violence results in an injury requiring the completion of other documents, such as a California Department of Industrial Relations Form 5020 (Employer's Report of Occupational Injury or Illness), the Cal/OSHA Form 301 Injury and Illness Incident Report, and/or California Department of Industrial Relations, Division of Workers' Compensation Form DWC-1 (Workers' Compensation Claim Form), then no Violent Incident Report is required. All forms are processed and stored in accordance with the applicable laws and

regulations relating to those forms. Even if no Violent Incident Report Form is completed, the information required by this Plan must still be recorded in the Violent Incident Log.

- Employees can use Informed K12 to access the [Workplace Violence Incident Form](#).
- Employees can report incidents to their direct supervisors. Employees may also report incidents of workplace violence to law enforcement, as appropriate.
- For every workplace violent incident, the Site coordinator shall complete a **Workplace Violent Incident Log** and provide it to the Director of Human Resources.
- Any person wishing to remain anonymous may use **STOPit**, our confidential reporting service to share their concerns. Please use the following QR to download the app.



District Office	Green Hills Elementary STOPit Access Code	Lomita Park Elementary STOPit Access Code	Meadows Elementary STOPit Access Code	Spring Valley Elementary STOPit Access Code	Taylor Middle School STOPit Access Code
Coming soon	greenhillsrams	lomitabears	memustangs	svstallions	TMSbulldogs

- Contact numbers for the District, local law enforcement and emergency services agencies may be available in multiple locations at every school site and are also provided below. During any non-emergency situation, employees involved in a workplace violence incident must [report it](#), as described above. The Director of Human Resources may then report the incident to law enforcement if warranted.

CONTACT	NUMBER	PHYSICAL LOCATION/OTHER CONTACT INFORMATION
MESD – Director of Human Resources	(650) 697-5693 ext. 033 cbuttigieg@millbraesd.org	555 Richmond Drive Millbrae, CA 94030
Green Hills - Principal - Kerry Dees	(650) 588-6485 ext.301 kdees@millbraesd.org	401 Ludeman Lane Millbrae, CA 94030
Lomita Park - Principal - Michelle Masuda	(650) 588-5852 ext. 541 mmasuda@millbraesd.org	200 Santa Helena Ave. San Bruno, CA 94066
Meadows - Principal - Julie Costantino	(650) 583-7590 ext. 641 jcostantino@millbraesd.org	1101 Helen Drive Millbrae, CA 94030
Spring Valley - Principal - Gordon Hwee	(650) 697-5681 ext. 841 ghwee@millbraesd.org	817 Murchison Drive Millbrae, CA 94030
Taylor - Principal - Erin Zlatunich	(650) 697-4096 ext. 984 ezlatunich@millbraesd.org	850 Taylor Blvd. Millbrae, CA 94030
Millbrae Police Bureau	(650) 259-2300	581 Magnolia Avenue Millbrae, CA 94030
San Mateo County Sheriff's Office	(650) 363-4911	330 Bradford Street Redwood City, CA 94063
Central County Fire Department (Millbrae)	(650) 558-7600 (650) 259-2400	511 Magnolia Avenue Millbrae, CA 94030

- Millbrae Elementary School District 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.

8. POST-INCIDENT RESPONSE AND INVESTIGATION

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

- Reviewing any relevant previous incidents
- Visiting the scene of an incident as soon as possible

- Interviewing injured and threatened employees and witnesses, including law enforcement and/or security personnel
- 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
- Reviewing any relevant physical, electronic or other evidence, such as video footage, photographs, and/or emails or other communications, if applicable
- Detailed description of the event
- Consequences of the incident, including, but not limited to: whether or not 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
- Taking corrective action to prevent the incident from recurring
- Preparing a written report of findings and any action taken, and ensuring corrective action is taken
- Obtain any reports completed by law enforcement, if possible
- Support and resources, such as counseling services, are provided to affected employees

Millbrae Elementary School District will inform the reporting individual of the results of the investigation (Workplace Violent Incident Log). Millbrae Elementary School District 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. Investigative reports prepared in accordance with this Plan shall not contain information, such as a 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.

9. IDENTIFYING WORKPLACE HAZARDS

Millbrae Elementary School District shall conduct inspections for workplace violence hazards on a periodic basis. Periodic inspections consist of identification, evaluation, and correction of workplace security hazards, unsafe conditions, and work practices, and employee reports and concerns. Hazards identified during the inspections must be documented.

Periodic inspections shall be conducted at a minimum as follows:

- A. When this plan is first established
- B. When Millbrae Elementary School District is made aware of new or previously unrecognized workplace violence hazards
- C. After each workplace violence incident
- D. Whenever there is a report of workplace violence
- E. Annually

Inspections must be documented using effective means to identify, evaluate, and correct workplace violence hazards. The date and name of the person conducting the inspections shall be documented. Any deficiencies must be documented and reported to the Director of Human Resources. Items will be addressed in a timely manner based on the severity of the hazard.

Periodic inspections may require assessing more than one type of workplace violence. Millbrae Elementary School District performs inspections for each type of workplace violence by using the methods specified in this Plan.

All identified hazards must be corrected. This includes hazards identified during the inspections, by employee concerns, by Violent Incident Report Forms, by workplace violence incidents, or whenever Millbrae Elementary School District is made aware of a new or previously unrecognized hazard.

Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for a minimum of five years. Please see the Recordkeeping Section of this plan.

The following personnel shall conduct periodic inspections in the following facilities/ departments/operations/sites:

INSPECTOR NAME/ JOB TITLE	FACILITY/DEPARTMENT/OPERATION/ SITE
Claudia Buttigieg - Director of Human Resources All Site Principals/Directors	All Sites

Periodic inspections may include the following:

- A. Review all workplace violence incidents that occurred within the previous year, regardless of whether an injury occurred.
- B. Review all reported workplace violence concerns, including those communicated to the Millbrae Elementary School District in accordance with the "Communication" and "Reporting Concerns of Workplace Violence" section of this plan.
- C. Identify and evaluate environmental risk factors for workplace violence in each facility, including surrounding areas, such as employee parking areas and other outdoor areas.
- D. An assessment of the following specific environmental risk factors:
 - a. Lack of posting of emergency telephone numbers for law enforcement, fire, and medical services.
 - b. Lack of employee access to a telephone with an outside line.
 - c. Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
 - d. The exterior and interior of the workplace for its attractiveness to criminals.
 - e. Procedures for employee response during a robbery or other criminal act, including Millbrae Elementary School District policy regarding prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act/other.
 - f. Employees working in locations isolated from other employees because their assignment requires them to work alone, in remote locations, during night or early morning hours, or where an assailant could prevent entry into the work area by responders or other employees.
 - g. Poor illumination or blocked visibility of areas where possible assailants may be present.
 - h. The need for surveillance measures, such as mirrors or cameras.

- i. Lack of physical barriers between employees and persons at risk of committing workplace violence.
- j. Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or other persons with whom an employee is having a dispute.
- k. Lack of effective escape routes.
- l. Lack of a designated safe area where employees can go in an emergency.
- m. Effective location and functioning of emergency buttons and alarms.
- n. Obstacles and impediments to accessing alarm systems.
- o. Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, including alarms/panic buttons/two-way radios.
- p. Locations within the facility where alarm systems are not operational.
- q. Entryways where unauthorized entrance may occur, such as doors designated for staff entrance or emergency exits.
- r. Procedures for reporting suspicious persons or activities.
- s. Storage of high-value items or currency.
- t. Community-based risk factors such as information relating to local crime conditions and the local police contact information.
- u. Frequency and severity of threatening or hostile situations that may lead to violent acts by recipients/visitors/parents/other.
- v. Employees' skill in safely handling threatening or hostile recipients/visitors/parents/other.
- w. Availability of security guards.
- x. The use of work practices such as the "buddy" system for specified emergency events.
- y. Failure to follow Millbrae Elementary School District's communication procedures and processes, in accordance with the "Communication" section of this plan.
- z. Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- aa. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

10. CORRECTING WORKPLACE VIOLENCE HAZARDS

Millbrae Elementary School District 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, Millbrae Elementary School District 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.

11. WORKPLACE VIOLENCE EMERGENCIES

In the event of an actual or potential workplace violence emergency, the district/school site will alert employees of the presence, location, and nature of the workplace violence through the following methods:

- Intercom, text message, two-way radio communication, email
- The site will have evacuation or sheltering plans as stated in the Comprehensive Safety Plan.
- School site uses standardized emergency language (lockdown/barricade, shelter in place, secure school)

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) 697-5693 ext. 026. If no security personnel are located at the worksite, employees shall call 911 to report the incident and request assistance from law enforcement.

If there is immediate danger, call for emergency assistance by dialing 9-1-1, and then notify the Director of Human Resources.

CONTACT	NUMBER	PHYSICAL LOCATION/OTHER CONTACT INFORMATION
MESD – Director of Human Resources	(650) 697-5693 ext. 033 cbuttigieg@millbraesd.org	555 Richmond Drive Millbrae, CA 94030
Millbrae Police Bureau	(650) 259-2300	581 Magnolia Avenue Millbrae, CA 94030
San Mateo County Sheriff's Office	(650) 363-4911	330 Bradford Street Redwood City, CA 94063
Central County Fire Department (Millbrae)	(650) 558-7600 (650) 259-2400	511 Magnolia Avenue Millbrae, CA 94030

12. INCIDENT RESPONSE AND RECOVERY

Millbrae Elementary School District 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 the injury could have been prevented; and
- Record the incident on the Workplace Violent Incident Log.

13. 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 Millbrae Elementary School District has for interactive questions and answers with a person knowledgeable about the 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 Millbrae Elementary School District has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid.
- 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.

14. EMPLOYEE INVOLVEMENT

It shall be the policy of Millbrae Elementary School District to engage with staff in the creation of the WVPP to meet the requirements of CA SB 553.

Millbrae Elementary School District shall meet with staff for listening/feedback sessions in person or virtually at a minimum of one (1) time upon the initial creation of the workplace violence plan at reasonable dates and times, allowing all employees to have an opportunity to attend. The WVPP model shall be provided to

employees at least ten (10) days before these sessions via email, registered mail, or other internal processes.

Millbrae Elementary School District will email, register mail, or use other internal processes to send all association presidents and union stewards a copy of the WVPP at least ten (10) days in advance. In addition, Millbrae Elementary School District will give association presidents and union stewards notice of the general staff listening/feedback session under the section above.

Any proposed changes to the WVPP are subject to written notice to all employees, association presidents, and union stewards 30 days before the proposed effective date. Notice shall be provided via email, registered mail, or other internal processes.

Nothing in the policy shall conflict with any current Memorandum of Understandings (MOU) between Millbrae Elementary School District and labor unions.

15. EMPLOYEE ACCESS TO THE WORKPLACE VIOLENCE PREVENTION PLAN

Millbrae Elementary School 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 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.
- WVPP will be posted on the Staff Intranet on the [District website](#). We will provide unobstructed access through the 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.

16. 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. (To the extent feasible, any associated written materials or presentations shall be kept with the relevant Training Attendance Log)

The following records shall be made available to employees and their authorized representatives, upon request and without cost, for examination and copying within 15 calendar days of a request: (1) Records of workplace violence hazard identification, evaluation and correction; (2) Training records showing the training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the

training, and names and job titles of all persons attending the training sessions and (3) the Violent Incident Log. Any employee personally identifiable information shall not be released, except as authorized by law. All records required by this Plan shall be made available to Cal-OSHA upon request and as required by law.

17. 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 confidentiality 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.
- Periodic Review and Revision.

18. EMPLOYER REPORTING RESPONSIBILITIES

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\), Reporting Work-Connected Fatalities and Serious Injuries](#), Millbrae Elementary School 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.

19. 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	7/1/2024	Initial Release	Angela Smith/Risk Manager
	7/1/2025	Annual Release	Angela Smith/Risk Manager
	7/1/2026	Annual Release	Angela Smith/Risk Manager

20. WVPP OWNERSHIP AND ADMINISTRATION

WVPP Site Coordinator

The Director of Human Resources is the designated WVPP 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 Principal will also be able to answer employee questions concerning this plan.

The Principal 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.

ITE/NAME/TITLE	DO - Claudia Buttigieg - Dir. of HR GH - Kerry Dees - Principal LP - Michelle Masuda - Principal ME - Julie Costantino - Principal SV - Gordon Hwee -Principal TAYLOR - Erin Zlatunich - Principal
DATE	7/1/2026

WVPP Program Administrator

The Director 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 Director of Human Resources will also be able to answer employee questions concerning this plan.

SIGNATURE	<i>Claudia Buttigieg</i>
NAME	Claudia Buttigieg
TITLE	Director of Human Resources
DATE	7/1/2026

21. K-12 EDUCATION SETTINGS AND DISABLED STUDENTS

In the K-12 school context, workplace violence scenarios involving disabled students or students suspected of being disabled require necessary consideration of additional laws and intra-school district coordination with responsible departments (e.g. Student Services, Special Education, Educational Services, etc.). Laws that must be considered include those concerning special education^[1], Section 504 of the Rehabilitation Act of 1973^[2] ("Section 504") and the Americans with Disabilities Act.^[3]

Students who are alleged to have engaged in workplace violence related to school attendance, regardless of disability status, will frequently be subject to disciplinary proceedings, including expulsion. In addition to Millbrae Elementary School District board policies and administrative regulations addressing student discipline, Education Code §§ 48900-48927 will need to be consulted with the appropriate district personnel and, if need be, legal counsel.

Students currently identified as disabled or suspected of being disabled under special education laws and/or Section 504 laws, and subject to removal from school or school activities for violations of codes of conduct such as those found in the Education Code, and that are considered a “change of placement” (e.g. more than 10 days of suspension in a school year, disciplinary transfers to different schools or settings, expulsion, etc.) are likely entitled to additional legal protection in the form of manifestation determination meetings^[4] that potentially can halt continued school removal absent narrow exceptions that allow removals of no more than 45 school days in accordance with narrowly tailored parameters.^[5] In addition to manifestation determinations connected to students with individualized education programs (“IEP”) or those that should have an IEP but do not^[6], the law also favors manifestation determinations for Section 504 eligible students that are subject to a “significant change of placement” arising out school-related misconduct.^[7]

Additionally, IEP-eligible students involved in behavioral emergencies, defined as “unpredictable, spontaneous behavior that poses clear and present danger of serious physical harm to the individual with exceptional needs, or others, and that cannot be immediately prevented by a response less restrictive than the temporary application of a technique used to contain the behavior”^[8] will be entitled under California law to additional considerations, including but not limited to, the potential right to an IEP meeting within two days of the behavior emergency in qualifying scenarios.^[9]

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1. See Title 34 C.F.R. § 300.530(g).
 2. See 20 U.S.C. § 1415(k)(5); Title 34 C.F.R. § 300.534.
 3. Although the term “manifestation determination” does not appear in the statutory or regulatory language of Section 504, the Office for Civil Rights (“OCR”) has interpreted Section 504 as requiring a manifestation determination in connection with disciplinary actions that constitute a “significant change in placement” under [Title 34 C.F.R. 104.35](#).
 4. See Education Code § 56521.1(a).
 5. See Title 34 C.F.R. § 300.530(g).
 6. See 20 U.S.C. § 1415(k)(5); Title 34 C.F.R. § 300.534.
 7. Although the term “manifestation determination” does not appear in the statutory or regulatory language of Section 504, the Office for Civil Rights (“OCR”) has interpreted Section 504 as requiring a manifestation determination in connection with disciplinary actions that constitute a “significant change in placement” under [Title 34 C.F.R. 104.35](#).
 8. See Education Code § 56521.1(a).
 9. See Education Code § 56521.1(g).

To report a Workplace Violence Incident:

<https://app.informedk12.com/campaigns#>