WORKPLACE VIOLENCE PREVENTION PROGRAM for The O'Farrell Charter Schools

Our establishment'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.

PURPOSE: To prevent acts of aggressive, threatening behavior and violence in the workplace.

SCOPE: This plan applies to all The O'Farrell Charter Schools employees in its entirety.

Date of Last Review: 06/24/2024

Date of Last Revision(s): 06/24/2024

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 hazard.

RESPONSIBILITY

The WVPP administrator, Human Resources Coordinator, has the authority and responsibility for implementing the provisions of this plan for The O'Farrell Charter Schools. If there are multiple persons responsible for the plan, their roles will be clearly described.

Responsible Persons	**Job Title/Position**	**WVPP Responsibility(ies)**	**Phone #**	**Email**
Cindy Wagner	Superintendent	**The superintendent** *approves the final plan and any major changes*.	619-266-0112	Cindy.wagner@ofarrellschool.org
Christina Puentes	Human Resources Coordinator	*The HR Coordinator organizes safety meetings, updates training materials, and handles any reports of workplace violence.*	619-677-5929	Christina.puentes@ofarrellschool.org
Susan Cuttitta	Director of Operations	Susan *conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.*	619-263-3009	Susan.cuttitta@ofarrellschool.org

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

EMPLOYEE ACTIVE INVOLVEMENT

The O'Farrell Charter Schools 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 quarterly 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 meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.

- Designing and implementing training.

  Employees are encouraged to participate in designing and implementing training programs, and their suggestions are incorporated into the training materials. For example, an employee is encouraged to suggest a new training scenario based on a recent incident.

- Reporting and investigating workplace violence incidents.

- 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.

- 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, supervisors, and managers in the provisions of The O'Farrell Charter Schools Workplace Violence Prevention Plan (WVPP)

- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP. Ensure current employees complete the training and make the training part of the onboarding process.

- 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 by memos/emails and/or certificate of recognition from your supervisor.

- Discipline employees for failure to comply with the WVPP. Failure to comply with the required trainings violates The O'Farrell Charter Schools policies and may results in disciplinary action. Please notify your supervisor if you need support with completing the training.

- Employees will be provided with time and space to complete the trainings upon hire or upon return of the school year.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employers, 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 and in the employees' first language.
- 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.
    - Employees can anonymously report a violent incident, threat, of other violence concerns.
    - Please call either the TK-8 main office (ext. 2216) or high school office (ext. 5000) for emergency response, notify the office of the emergency and 911 will be called if necessary. This will allow for a central notification center and provide clarity in the event of an 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. 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. Sharing training materials and incident reports with other supervisors to ensure a coordinated response to any incidents. This could involve sending copies of training materials and incident reports to supervisors.

COORDINATION WITH OTHER EMPLOYERS

The O'Farrell Charter Schools will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees

understand their respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, The O'Farrell Charter Schools will ensure that if its employees experience workplace violence incident that The O'Farrell Charter Schools will record the information in a violent incident log and shall also provide a copy of that log to controlling employer.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

The O'Farrell Charter Schools 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. This will be accomplished by phone. If that's not possible, employees will report incidents directly to the WVPP administrator, Superintendent Cindy Wagner, at cindy.wagner@ofarrellschool.org.
- Employees can report incidents to their supervisor, HR, or through an anonymous online form.
    - Anonymous: Workplace Violence Incident Reporting Form or scan here:

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

EMERGENCY RESPONSE PROCEDURES

The O'Farrell Charter Schools 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. (Lockdown Procedure)
- The O'Farrell Charter Schools will have evacuation or sheltering plans. The plans include maps of evacuation routes, locations of emergency exit, and instructions for sheltering in place.

- How to obtain help from staff, security personnel, or law enforcement. If there is immediate danger, call for emergency assistance by dialing (9) 9-1-1, and then notify the WVPP Administrator.

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

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Susan Cuttitta	Director of Operations	Susan conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.	(619) 323-4209	Susan.cuttitta@ofarrellschool.org

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by The O'Farrell Charter Schools 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:

  - Online form for reporting workplace violence hazards

  - Voicemail/email/text messages

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: Quarterly.

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
Susan Cuttitta	All Campuses
Christina Puentes	All Campuses

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 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 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.
- 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.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. The O'Farrell Charter Schools 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 necessary to correct the hazardous condition will be provided with the necessary protection. Employees necessary to correct the hazardous condition will be identified individually.
- All corrective actions taken will be documented and dated on the appropriate forms.
- Corrective measures for workplace violence hazards will be specific to a given work area.
    - Make the workplace unattractive to robbers by:
        - Improve lighting around and at the workplace.
        - Post of signs notifying the public that there is no cash is kept on the premises and that cameras are monitoring the facility.
        - 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.
        - Install security surveillance cameras in and around the workplace.
    - Provide workplace violence systems, such as door locks, violence windows, physical barriers, emergency alarms and restraint systems by:
        - Ensure the adequacy of workplace violence systems.
        - Post emergency telephone numbers for law enforcement, fire, and medical 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.
        - Install effective systems to warn others of a violence danger or to summon assistance, e.g., alarms or panic buttons.
    - 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:

- 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.

- Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.

- Establish a policy for prohibited practices (No-weapons policy, Visitor Check-In/Out Procedures).

- Limit the amount of cash on hand and use time access safes for large bills.

- Provide procedures for a "buddy" system for specified emergency events.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

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 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 risks 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 ensuring corrective actions are taken.
- 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: [See attached Violent Incident Log]
    - 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, may be available to affected employees.

Ensure that no personal identifying information is recorded or documented in the violent incident log. 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.
- 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.

The O'Farrell Charter Schools 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.

- Workplace violence hazards specific to the employees' jobs, the corrective measures The O'Farrell Charter Schools 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 The O'Farrell Charter Schools 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.
    - 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.

Note: *Employers must use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.*

EMPLOYEE ACCESS TO THE WRITTEN WVPP

The O'Farrell Charter Schools 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 our 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-workers.

RECORDKEEPING

The O'Farrell Charter Schools 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:
    - 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, 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 O'Farrell Schools' 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 O'Farrell Charter Schools 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 O'Farrell Charter Schools 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.

"I, Cindy Wagner, Superintendent of The O'Farrell Charter Schools, 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."

Cindy Wagner, Superintendent

Cindy Wagner

Signature

Jul 16, 2024

Date