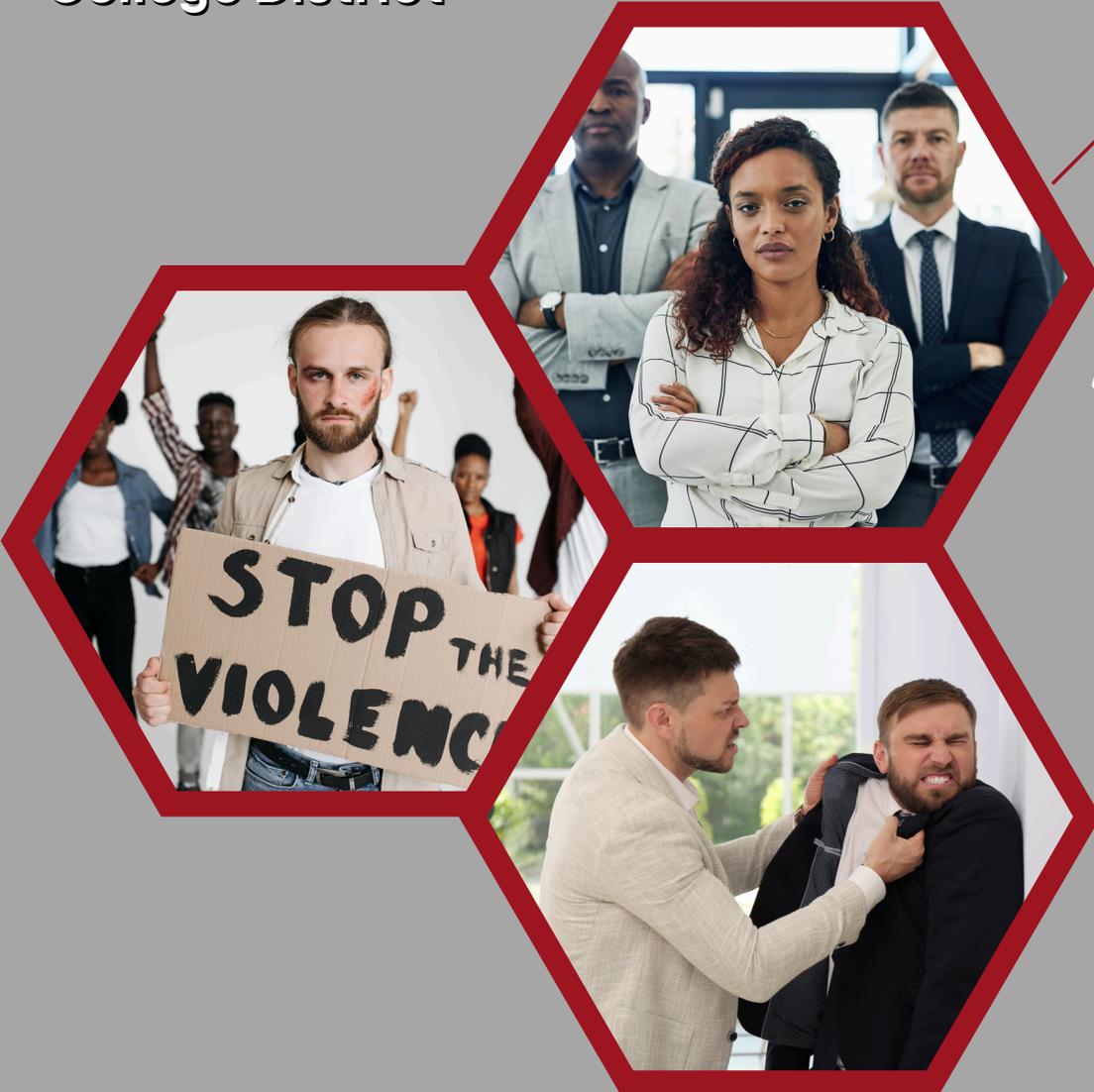


Pasadena Area
Community
College District



**WORKPLACE
VIOLENCE
PREVENTION
PLAN**



WORKPLACE VIOLENCE PREVENTION PLAN

Effective Date: July 1, 2024

INTRODUCTION

The Workplace Violence Prevention Law mandates that nearly all employers in California must develop, adopt, and put into action written Workplace Violence Prevention Plans. These plans encompass various components, including annual training on preventing workplace violence, maintaining records of violent incidents, and preserving various documents. Senate Bill 553 (SB 553) compels the Division to enforce new workplace violence requirements, largely based on Cal/OSHA's existing draft standard.

Workplace safety is paramount, and the well-being of our employees is a top priority. In compliance with California's Workplace Violence Prevention Law, we have developed this Workplace Violence Prevention Plan to provide a safe and secure working environment for all our employees.

This plan outlines our commitment to proactively address the risks associated with workplace violence and sets forth the guidelines and procedures to prevent and respond to such incidents. By fostering a culture of respect, communication, and vigilance, we aim to create a workplace where everyone feels valued, protected, and empowered to report any concerns related to violence or harassment.

Our commitment to workplace safety extends to all employees, visitors, clients, and contractors who may interact with our organization. This plan serves as a comprehensive resource for understanding the steps we have taken and will continue to take to ensure a violence-free workplace.

We encourage all employees to familiarize themselves with this plan, participate in the provided training, and actively contribute to our shared responsibility for workplace safety. Together, we can maintain a work environment where each individual can thrive and achieve their full potential without fear of violence or intimidation.

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I. PURPOSE AND AUTHORITY

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

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

- **Accountability:** The plan will clearly define the individuals responsible for implementing and maintaining the Workplace Violence Prevention Plan.
- **Employee Engagement:** Active employee participation is encouraged in developing, implementing, and reviewing the plan. Involvement is vital in identifying and addressing workplace violence risks, shaping training programs, and reporting incidents.
- **Coordination:** Procedures will be outlined for coordinating the execution of the plan among employees in the same department or facility.
- **Emergency Response:** Procedures will be established for promptly seeking assistance from Campus Police during all work shifts. Importantly, the plan will strictly prohibit any form of retaliation against employees seeking help.
- **Incident Response:** The plan will detail procedures for addressing workplace violence incidents and will strictly prohibit any form of retaliation against employees who report such incidents.
- **Compliance:** Stringent procedures will ensure adherence to the Workplace Violence Prevention Plan.
- **Communication:** Clear communication channels will be established to keep everyone informed about workplace violence matters.
- **Training:** Comprehensive training programs will be provided based on the Workplace Violence Prevention Plan.
- **Risk Assessment:** Rigorous risk assessment procedures will be in place to identify and evaluate potential workplace violence factors.
- **Hazard Correction:** If any hazards are identified, prompt corrective action will be taken.
- **Post-Incident:** Procedures will guide response and investigation following workplace violence incidents.

II. WHO IS RESPONSIBLE FOR IMPLEMENTING THE PLAN

Identification of Responsible Parties

The effectiveness of Pasadena City College's (PCC) Workplace Violence Prevention Plan (WVPP) relies upon clear and accountable implementation. To ensure the seamless execution of this plan, it is imperative to explicitly identify the individuals entrusted with the responsibility of overseeing and implementing the WVPP. The following sections delineate the roles and responsibilities of these key personnel:

1. Senior Management:

Senior Management, including Assistant Superintendent/Vice President, Business and Administrative Services shall hold ultimate responsibility for the overall implementation and success of the WVPP. Their roles encompass:

- Providing Leadership: Leading by example and fostering a culture of workplace safety.
- Allocating Resources: Ensuring adequate resources, including funding, personnel, and training, to support the WVPP.
- Establishing Guidelines: Formulating and updating the guidelines outlined in the plan that align with the WVPP's objectives.
- Reviewing and Approving Plans: Reviewing and approving departmental and facility specific WVPPs.

2. WVPP Coordinator:

The WVPP Coordinator, designated as Executive Director, Business Services is directly responsible for the day-to-day oversight and coordination of the WVPP. Their duties include:

- Plan Development: Collaborating with relevant stakeholders to develop and maintain the WVPP.
- Employee Training: Organizing and facilitating WVPP training for all employees.
- Incident Reporting: Managing the reporting and investigation of workplace violence incidents.
- Compliance Assurance: Ensuring compliance with all WVPP requirements and regulations.

3. Departmental Supervisors/Managers:

Supervisors and Managers within each department or facility, as identified by Business Services, Human Resources, Facilities Services, and Police and Safety Services, have a crucial role in implementing the WVPP at the ground level. Their responsibilities include:

- Employee Education: Ensuring that employees under their supervision are aware of the WVPP and are trained accordingly.
- Incident Reporting: Promptly reporting any workplace violence incidents to the WVPP Coordinator.
- Hazards Mitigation: Taking immediate corrective actions to address any identified hazards or risks.

4. All Employees:

Every employee within our organization plays a vital part in the success of the WVPP. Their responsibilities encompass:

- Compliance: Adhering to the Workplace Violence Prevention Plan guidelines.
- Reporting: Reporting any observed or experienced workplace violence incidents promptly.
- Active Participation: Actively participating in training, hazard identification, and incident prevention efforts.

The clear identification of these responsible individuals ensures that the WVPP remains a dynamic and effective tool for preventing workplace violence. Through the collective efforts of these designated parties, PCC is committed to fostering a safe and secure work environment for all employees.

III. DEFINITION OF WORKPLACE VIOLENCE

Workplace violence encompasses various forms of behavior, including but not limited to the following:

(i) It involves the threat or use of physical force against an employee, and this behavior can result in, or have a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.

(ii) Workplace violence also encompasses incidents that entail the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, even if the employee does not sustain an injury as a result.

(iii) Workplace violence can be categorized into four distinct types:

(I) Type 1 violence is characterized by workplace violence committed by a person who has no legitimate business at the worksite. This category includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.

(II) Type 2 violence refers to workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

(III) Type 3 violence involves workplace violence against an employee by a present or former employee, supervisor, or manager.

(IV) Type 4 violence pertains to 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.

(C) It's important to note that workplace violence does not encompass lawful acts of self-defense or defense of others.

IV. PROCEDURES TO OBTAIN ACTIVE INVOLVEMENT OF EMPLOYEES IN DEVELOPING AND IMPLEMENTING THE PLAN

Active Involvement of Employees

PCC's commitment to a safe and secure work environment hinge upon the active participation of all employees in the development and implementation of our Workplace Violence Prevention Plan (WVPP). This section outlines the procedures and mechanisms in place to ensure their meaningful involvement in various aspects of the WVPP:

1. Identification and Evaluation of Hazards:

The success of our WVPP begins with the identification and evaluation of potential workplace violence hazards. We encourage and facilitate the active involvement of employees and authorized employee representatives in this process by:

- **Open Communication:** Providing channels for employees to communicate their concerns and observations regarding potential hazards.
- **Reporting Mechanisms:** Establishing clear and accessible reporting procedures for employees to notify relevant personnel of workplace violence concerns.

2. Design and Implementation of Training:

To ensure that training programs are relevant and beneficial, employees are actively involved by:

- **Input and Feedback:** Encouraging employees to provide input and feedback on training content and methods.
- **Participation in Training Development:** Involving employees in the development of training materials and delivery methods.

3. Reporting and Investigating Incidents:

Prompt reporting and thorough investigation of workplace violence incidents are essential. Employees are integral to this process by:

- **Incident Reporting:** Encouraging employees to report all incidents of workplace violence promptly, ensuring confidentiality and non-retaliation.
- **Investigation Participation:** Allowing employees to participate in incident investigations, providing valuable insights.

4. WVPP Review and Refinement:

PCC's WVPP is a dynamic document that evolves with changing circumstances. Employees and are actively engaged in this process by:

- **Regular Reviews:** Conducting periodic reviews of the WVPP with input from employees and authorized employee representatives.
- **Recommendations:** Encouraging employees and representatives to make recommendations for improvements and revisions.

5. Representation and Committees:

To facilitate employee participation, we may establish representative committees or designate specific employee representatives. These representatives will play a pivotal role in advocating for employee interests and collaborating with management to enhance workplace safety.

The active involvement of employees and authorized employee representatives is not just encouraged; it is integral to the success of our WVPP. By fostering a culture of open communication, collaboration, and shared responsibility, we aim to create a workplace where everyone actively contributes to the prevention of workplace violence and the promotion of a secure and harmonious environment.

V. REPORTS OF WORKPLACE VIOLENCE

Reporting Workplace Violence and Prohibition of Retaliation

PCC's commitment to creating a safe and secure work environment is supported by effective procedures for reporting workplace violence incidents and a committed prevention of retaliation against employees who make such reports. This section outlines the procedures we have in place to accept and respond to reports of workplace violence, ensuring that employees are protected from any form of retaliation.

1. Reporting Procedures:

- a. Reporting Incidents: Any employee who witnesses or experiences an incident of workplace violence is encouraged to report it promptly. Employees should report workplace violence via the Online Reporting Platform and/or call 9-1-1 if the threat/act of violence is imminent and serious.
- b. Anonymous Reporting: We recognize that some employees may prefer to make anonymous reports. To facilitate this, we provide a confidential reporting mechanism, such as a designated hotline or reporting form, for employees to share their concerns without fear of retribution.

2. Response to Reports:

- a. Immediate Action: Upon receipt of a report, we will promptly initiate an appropriate response. This may include assessing the immediate safety of those involved, conducting an initial investigation, and involving relevant personnel, such as security or law enforcement, as necessary.
- b. Designated Contact: We have designated Executive Director, Business as the primary point of contact responsible for overseeing the response to workplace violence reports. This individual is trained to handle such matters with sensitivity and discretion.

3. Investigation Process:

- a. Formal Investigation: When warranted, a formal investigation will be conducted to gather all relevant information, interview witnesses, and assess the situation thoroughly. The investigation will be conducted impartially and without bias.
- b. Confidentiality: We will maintain the confidentiality of all parties involved to the fullest extent possible during the investigation process.

4. Prohibition of Retaliation:

- a. Non-Retaliation Policy: PCC strictly prohibits any form of retaliation against employees who make reports of workplace violence in good faith. Retaliation includes but is not limited to adverse actions, such as termination, demotion, harassment, or any form of discriminatory treatment (Refer to AP 3410 and AP3430).
- b. Awareness and Training: We provide training to all employees to ensure they are aware of our non-retaliation policy and understand their rights and protections under the law.

5. Remedial Actions:

- a. Corrective Actions: If workplace violence is substantiated, appropriate corrective actions will be taken to address the situation, including disciplinary measures against the perpetrator.
- b. Support for Victims: PCC is committed to providing support and resources to victims of workplace violence, including counseling and assistance with legal remedies when applicable.

6. Reporting and Record-Keeping:

All workplace violence reports, investigations, and related actions will be thoroughly documented and maintained in accordance with applicable laws and regulations. These records will be accessible to authorized personnel for review and compliance monitoring.

By establishing these procedures for reporting workplace violence and prohibiting retaliation, Pasadena Area Community College District aims to create an environment where employees feel safe and empowered to report incidents, confident that they will be protected from any adverse consequences

for doing so. Our commitment to a workplace free from violence and retaliation is unwavering, and we encourage all employees to be active participants in maintaining a secure and respectful work environment.

VI. ENSURING COMPLIANCE WITH THE WORKPLACE VIOLENCE PREVENTION PLAN

PCC's commitment to a safe and secure work environment hinge on the consistent and uniform compliance of all supervisory and nonsupervisory employees with our Workplace Violence Prevention Plan (WVPP). We have established procedures to ensure that the plan is adhered to in a manner consistent with the requirements of California Code of Regulations, Title 8, Section 3203, Subsection (a), Paragraph (6).

1. Education and Training:

- a. **Mandatory Training:** All employees, including supervisory and nonsupervisory personnel, will receive mandatory training on the WVPP. This training will cover the plan's provisions, objectives, and the specific roles and responsibilities of employees in preventing and responding to workplace violence. Training must be completed within one week of hire.
- b. **Periodic Refresher Training:** To ensure ongoing compliance and awareness, periodic refresher training sessions will be conducted for all employees. Per Labor Code 5401.9, training must be completed annually.

2. Supervision and Oversight:

- a. **Supervisory Responsibility:** Supervisors play a pivotal role in ensuring compliance with the WVPP among their respective teams. They are responsible for overseeing and enforcing the plan's guidelines.
- b. **Consistency Checks:** Supervisors will conduct regular checks to ensure that employees under their supervision are consistently adhering to the WVPP guidelines.

3. Reporting and Documentation:

- a. **Incident Reporting:** All employees are required to promptly report any incidents of workplace violence or potential hazards to their immediate supervisor, manager, or the designated WVPP Coordinator. Reporting is a fundamental aspect of plan compliance.
- b. **Documentation of Incidents:** Incidents, investigations, and actions taken to address workplace violence will be thoroughly documented and maintained as part of our commitment to compliance.

4. Communication:

- a. **Open Lines of Communication:** We encourage open and transparent communication channels between employees and management. Any concerns, suggestions, or questions regarding the WVPP are welcomed and will be addressed promptly.

5. Accountability and Consequences:

- a. **Accountability:** All employees are accountable for their actions in relation to the WVPP. Failure to comply with the plan's provisions may result in disciplinary actions, as deemed appropriate and in accordance with our District's guidelines outlined in the plan.

6. Continuous Improvement:

- a. **Feedback Mechanisms:** We encourage feedback from employees regarding the WVPP's effectiveness and any potential areas for improvement. This feedback will be considered for ongoing enhancements to the plan.

By providing comprehensive education and training, establishing supervisory oversight, fostering open communication, and holding individuals accountable for their actions, we aim to create a workplace where all employees understand and adhere to the principles of our Workplace Violence Prevention Plan.

VII. COMMUNICATION WITH EMPLOYEES REGARDING WORKPLACE VIOLENCE MATTERS

Effective communication is a cornerstone of our commitment to maintaining a safe and secure work environment. PCC's Workplace Violence Prevention Plan (WVPP) is founded on clear procedures to ensure employees are informed about workplace violence matters, including reporting incidents or concerns and the subsequent investigation process. This section outlines our communication procedures in compliance with regulatory requirements:

1. Reporting Workplace Violence Concerns:

- a. **Open Reporting Channels:** We maintain open and accessible reporting channels that enable employees to report violent incidents, threats, or other workplace violence concerns without fear of reprisal. Employees can make reports to their immediate supervisor, manager, the designated WVPP Coordinator, or through established reporting mechanisms.
- b. **Confidential Reporting:** We respect the confidentiality of employees who choose to make reports and will take steps to protect their identity to the extent permitted by law. Anonymous reporting options, such as a designated hotline or reporting form, are also available.

2. Investigation Procedures:

- a. **Immediate Action:** Upon receipt of a report, we will promptly initiate an appropriate response, including assessing the immediate safety of those involved.
- b. **Formal Investigation:** When necessary, a formal investigation will be conducted by trained personnel to gather all relevant information, interview witnesses, and assess the situation thoroughly. The investigation will be impartial and free from bias.
- c. **Confidentiality:** We will maintain the confidentiality of all parties involved to the fullest extent possible during the investigation process.

3. Results and Corrective Actions:

- a. **Communication of Results:** Once the investigation is complete, employees who made reports will be informed of the results of the investigation to the extent permitted by law. This communication will include an overview of the findings and any corrective actions that will be taken.
- b. **Corrective Actions:** When appropriate, corrective actions will be implemented to address workplace violence concerns. These actions may include disciplinary measures against perpetrators or adjustments to our workplace violence prevention strategies.

4. Training and Awareness:

- a. Training Programs: We provide training to all employees to ensure they are aware of our reporting procedures and the investigation process. This training is designed to empower employees to report concerns confidently.
- b. Continued Awareness: Periodic awareness reminders will be disseminated to keep employees informed about workplace violence matters, the reporting process, and the organization's commitment to a safe workplace.

5. Ongoing Communication:

- a. Continuous Feedback: We encourage employees to provide feedback on our communication and reporting procedures. Suggestions for improvements are welcomed and will be considered for ongoing enhancements to the WVPP.

By providing clear reporting procedures, ensuring confidentiality, communicating investigation results, and taking appropriate corrective actions, we aim to create a workplace where employees feel safe and empowered to report workplace violence concerns, knowing their concerns will be taken seriously and addressed promptly.

VIII. RESPONDING TO WORKPLACE VIOLENCE EMERGENCIES

PCC's Workplace Violence Prevention Plan (WVPP) includes comprehensive procedures to respond to actual or potential workplace violence emergencies, ensuring the swift and appropriate action needed to protect our workforce. This section outlines our procedures in accordance with regulatory requirements:

1. Alerting Employees:

- a. Alert System: We have implemented an effective alert system that enables the rapid notification of all employees in the event of a workplace violence emergency. This system includes audible alarms, visual alerts, and digital notifications, ensuring that employees are promptly informed of the presence, location, and nature of the emergency.
- b. Training and Familiarization: All employees will receive training on the use of the alert system, including how to recognize and respond to alerts.

2. Evacuation and Sheltering Plans:

- a. Evacuation Plans: We have developed comprehensive evacuation plans that are tailored to the specific characteristics of our worksite. These plans include designated evacuation routes, assembly areas, and procedures for employees to follow during an evacuation.
- b. Sheltering Plans: In situations where evacuation may not be feasible or safe, we have established sheltering plans that provide employees with guidance on taking cover and seeking safety within the worksite.

3. Obtaining Help and Assistance:

- a. Staff Response: We have designated trained personnel who are responsible for responding to workplace violence emergencies. These staff members are equipped with the knowledge and skills necessary to manage and mitigate emergency situations.
- b. Security Personnel: If applicable, our security personnel are trained to respond to workplace violence emergencies and will be available to assist employees.

c. Law Enforcement: In the event of a severe workplace violence emergency that cannot be managed internally, we have established procedures to obtain assistance from law enforcement agencies. This includes clear communication channels and designated points of contact for coordinating with law enforcement.

4. Employee Training:

- a. Emergency Response Training: All employees will receive training on how to respond to workplace violence emergencies. This training will cover the use of the alert system, evacuation procedures, sheltering protocols, and how to obtain help from designated staff, security personnel, and law enforcement.
- b. Drills and Exercises: We will conduct regular emergency response drills and exercises to ensure that employees are familiar with the procedures and can respond effectively in high-stress situations.

IX. DEVELOPING AND PROVIDING WORKPLACE VIOLENCE PREVENTION TRAINING

Effective training is essential to the success of our Workplace Violence Prevention Plan (WVPP). This section outlines the procedures we have in place for the development and delivery of the training required by subdivision (e):

1. Training Program Development:

- a. Training Content: Our WVPP training program is developed to encompass all aspects of workplace violence prevention as mandated by regulatory requirements. This includes, but is not limited to, identifying potential violence hazards, reporting incidents, responding to emergencies, and understanding the roles and responsibilities of employees.
- b. Customization: We tailor our training content to reflect the unique characteristics of our organization and worksite, ensuring that it remains relevant and effective.

2. Training Delivery:

- a. Training Formats: To accommodate diverse learning styles and preferences, we offer multiple training formats. These may include in-person classroom sessions, online modules, video presentations, and written materials.
- b. Frequency: Training is provided to all employees upon hire and is repeated at regular intervals, ensuring that all employees remain informed and up-to-date on workplace violence prevention measures.

3. Training Instructors:

- a. Qualified Instructors: Our training sessions are conducted by qualified instructors who possess the necessary expertise in workplace violence prevention. Instructors may include internal personnel, external experts, or certified trainers.
- b. Interactive Learning: We encourage interactive learning through discussions, case studies, and scenario-based exercises to promote engagement and understanding.

4. Record-Keeping:

a. Training Records: Detailed records of training sessions, including attendee lists, dates, and content covered, are maintained and made accessible for compliance monitoring and audit purposes.

5. Continuous Improvement:

a. Feedback Mechanisms: We actively seek feedback from employees regarding the training program's effectiveness and relevance. Suggestions for improvements are considered for ongoing enhancements to the training content and delivery.

6. Accessibility:

a. Accommodations: We provide reasonable accommodations to ensure that all employees have equal access to training materials and sessions, taking into account individual needs and abilities.

X. IDENTIFYING AND EVALUATING WORKPLACE VIOLENCE HAZARDS

PCC's Workplace Violence Prevention Plan (WVPP) is built on procedures designed to identify and evaluate workplace violence hazards effectively. This section outlines our comprehensive approach, which includes scheduled inspections, employee reporting, and hazard assessment in accordance with regulatory requirements:

1. Scheduled Periodic Inspections:

a. Initial Inspection: When our WVPP is first established, a comprehensive inspection of our workplace will be conducted to identify potential workplace violence hazards. This initial assessment will serve as the foundation for our ongoing hazard prevention efforts.

b. Periodic Inspections: Scheduled inspections will be conducted at regular intervals to ensure that workplace violence hazards are continuously monitored and addressed. The frequency of these inspections will be determined based on the nature of our worksite and its potential hazards.

2. Post-Incident Inspections:

a. After Each Incident: Following each workplace violence incident, regardless of its severity, an immediate post-incident inspection will be conducted to assess the factors that contributed to the incident. This includes examining both physical conditions and work practices.

3. Employee Reports and Concerns:

a. Reporting Channels: Employees are encouraged to report any workplace violence concerns or hazards they observe promptly. Reporting channels include supervisors, managers, the designated WVPP Coordinator, or established reporting mechanisms.

b. Anonymous Reporting: We respect employees' confidentiality and provide anonymous reporting options, such as a designated hotline or reporting form, for those who wish to make reports without fear of reprisal.

4. Hazard Assessment:

a. Hazard Identification: Identified hazards will be thoroughly assessed to determine their severity and potential impact on employee safety. This assessment will include the classification of hazards and their potential consequences.

5. Corrective Actions:

a. Timely Mitigation: Once hazards are identified and evaluated, corrective actions will be implemented promptly to eliminate or minimize the identified risks. These actions may include changes to physical facilities, work practices, or guidelines outlined in the plan.

6. Continuous Improvement:

a. Feedback Mechanisms: We encourage employees to provide feedback and report concerns regarding workplace violence hazards. This feedback is vital for continuous improvement and refinement of our hazard identification and mitigation efforts.

7. Documentation:

a. Records Maintenance: Detailed records of inspections, hazard assessments, and corrective actions will be maintained and made accessible for compliance monitoring and audit purposes.

By following these procedures for identifying and evaluating workplace violence hazards, we are committed to fostering a safe and secure work environment. These efforts aim to prevent potential incidents and continuously improve our workplace violence prevention measures.

XI. CORRECTING WORKPLACE VIOLENCE HAZARDS IN A TIMELY MANNER

This section outlines our procedures for correcting identified hazards in accordance with California Code of Regulations, Title 8, Section 3203, Subsection (a), Paragraph (6):

1. Hazard Identification:

a. Identifying Hazards: As outlined in our procedures for identifying and evaluating workplace violence hazards, hazards will be identified through scheduled inspections, post-incident assessments, and employee reports and concerns.

2. Prompt Corrective Action:

a. Immediate Response: Upon the identification of a workplace violence hazard, immediate action will be taken to correct or mitigate the hazard as appropriate. The severity and potential consequences of the hazard will guide the urgency of the response.

3. Corrective Measures:

a. Hazard Elimination: Whenever possible, hazards will be eliminated entirely. This may involve modifying physical facilities, implementing policy changes, or altering work practices to remove the identified risk.

b. Temporary Controls: In situations where immediate hazard elimination is not feasible, temporary controls will be implemented to minimize the risk and protect employee safety.

c. Interim Procedures: Interim procedures will be established to ensure that employees can continue to work safely while long-term corrective actions are being planned and implemented.

4. Prioritization:

a. Assessment of Priority: Each identified hazard will be assessed to determine its priority based on factors such as severity, potential harm, and likelihood of occurrence. Hazards with higher priority will receive immediate attention.

5. Timely Resolution:

- a. Timelines: Specific timelines for correcting workplace violence hazards will be established based on the hazard's priority and complexity. Hazards deemed high-priority or posing an imminent threat will be addressed with the utmost urgency.
- b. Monitoring Progress: We will closely monitor the progress of corrective actions to ensure that they are executed within the established timelines.

6. Documentation:

- a. Records Maintenance: Detailed records of identified hazards, corrective actions taken, and the timelines for resolution will be maintained and made accessible for compliance monitoring and audit purposes.

7. Continuous Improvement:

- a. Feedback Mechanisms: We encourage employees to provide feedback on the effectiveness of corrective actions and hazard mitigation efforts. This feedback is essential for continuous improvement in our hazard correction procedures.

By following these procedures, we are committed to ensuring that workplace violence hazards are corrected in a timely manner, in line with regulatory requirements. Our goal is to create a workplace where employees can perform their duties safely and without exposure to preventable risks.

XII. POST-INCIDENT RESPONSE AND INVESTIGATION

Prompt and effective post-incident response and investigation procedures are critical components of our commitment to maintaining a safe workplace. This section outlines our procedures for responding to and investigating workplace violence incidents:

1. Immediate Response:

- a. Safety First: The immediate safety and well-being of individuals involved in a workplace violence incident are our top priorities. Any necessary medical attention will be provided promptly.
- b. Secure the Scene: The scene of the incident will be secured to ensure the preservation of evidence and to prevent interference with the investigation.

2. Incident Reporting:

- a. Reporting Procedures: All workplace violence incidents, regardless of their nature or severity, must be reported immediately to a supervisor, manager, the designated WVPP Coordinator, or through established reporting channels.
- b. Documentation: Detailed records of the incident, including the date, time, location, individuals involved, and any witnesses, will be maintained as part of the incident reporting process.

3. Preliminary Assessment:

- a. Initial Assessment: A preliminary assessment of the incident will be conducted to gather essential information and determine the appropriate course of action for further investigation.

4. Formal Investigation:

- a. Investigation Team: Trained personnel, including the designated WVPP Coordinator or other qualified investigators, will be assigned to conduct a formal investigation into the incident. The team will be impartial and free from bias.
- b. Evidence Gathering: The investigation will involve the collection of evidence, including witness interviews, photographic documentation, and any relevant physical evidence.
- c. Confidentiality: The confidentiality of individuals involved in the incident will be maintained to the fullest extent possible during the investigation process.

5. Communication:

- a. Reporting to Employees: Employees who have reported or witnessed the workplace violence incident will be informed of the status and progress of the investigation to the extent permitted by law.
- b. Reporting to Law Enforcement: In cases where the incident may involve criminal activity, law enforcement will be notified as required by law. Cooperation with law enforcement agencies will be facilitated.

6. Findings and Corrective Actions:

- a. Investigation Report: Upon the completion of the investigation, a comprehensive report will be generated, detailing the findings, conclusions, and recommendations for corrective actions.
- b. Corrective Actions: Based on the investigation findings, appropriate corrective actions will be implemented promptly to address the incident's causes and prevent recurrence. These actions may include disciplinary measures, policy changes, or security enhancements.

7. Documentation and Records:

- a. Records Maintenance: All records related to post-incident response and investigation, including investigation reports, witness statements, and corrective action documentation, will be maintained and made accessible for compliance monitoring and audit purposes.

8. Continuous Improvement:

- a. Feedback Mechanisms: We encourage employees to provide feedback on the post-incident response and investigation process. Suggestions for improvements are welcomed and will be considered for ongoing enhancements.

Our commitment to thorough and effective post-incident response and investigation procedures is unwavering. By following these procedures, we aim to provide support to those affected by workplace violence incidents, ensure accountability, and continuously improve our workplace violence prevention efforts.

XIII. REVIEWING AND REVISING THE WORKPLACE VIOLENCE PREVENTION PLAN

The effectiveness of our Workplace Violence Prevention Plan (WVPP) relies on continuous evaluation, improvement, and employee involvement. This section outlines our procedures for reviewing and revising the plan, in accordance with regulatory requirements:

1. Annual Review:

a. Frequency: The WVPP will be reviewed at least annually to assess its effectiveness and relevance. This annual review ensures that the plan remains up-to-date and aligned with current workplace conditions and potential hazards.

2. Employee Involvement:

a. Active Participation: Employees and authorized employee representatives will be actively involved in the review process. Their insights, concerns, and feedback are essential for assessing the plan's effectiveness.

b. Feedback Mechanisms: We encourage employees to provide feedback and suggestions for improvements throughout the year. This feedback will be considered during the annual review and at other relevant times.

3. Deficiency Observation:

a. Immediate Response: When a deficiency in the plan is observed or becomes apparent, prompt action will be taken to address and rectify the deficiency. This may involve interim measures to mitigate risks until a comprehensive review can be conducted.

4. Post-Incident Review:

a. After Workplace Violence Incidents: Following each workplace violence incident, a comprehensive review of the incident and its impact on the WVPP will be conducted. This includes an assessment of whether the plan's response was effective and whether any modifications are necessary.

5. Review Process:

a. Assessment: During the review process, the WVPP will be assessed for its effectiveness in identifying, preventing, and responding to workplace violence hazards and incidents.

b. Revisions: If deficiencies, gaps, or areas for improvement are identified during the review, revisions to the plan will be made promptly to address these issues. These revisions may involve changes to the procedures, training, or other elements of the plan.

6. Documentation and Records:

a. Records Maintenance: Detailed records of the WVPP reviews, including findings, revisions, and timelines, will be maintained and made accessible for compliance monitoring and audit purposes.

7. Continuous Improvement:

a. Action Plans: If necessary, action plans will be developed to address deficiencies or areas for improvement identified during the review process. These action plans will include specific steps, responsible parties, and timelines for implementation.

8. Communication:

a. Employee Notification: Employees will be informed of the outcomes of the WVPP review and any revisions made to the plan. Communication of plan changes will ensure that employees are aware of updates and their roles within the revised plan.

Our commitment to regular plan review and revision ensures that the WVPP remains an effective tool for safeguarding our workplace. By actively involving employees, addressing deficiencies promptly, and continuously improving the plan, we aim to create a workplace where safety and security are top priorities.

XIV. ENSURING HEALTH AND SAFETY THROUGH ADDITIONAL PROCEDURES

In addition to the specific requirements outlined in this Workplace Violence Prevention Plan (WVPP), we are committed to the overall health and safety of our employees. This section addresses the need for procedures and other information as determined by regulatory standards to safeguard employee health and safety, pursuant to subdivision (h):

1. Regulatory Compliance:

a. Ongoing Monitoring: We will remain vigilant in monitoring and adhering to any additional procedures or standards that may be required by the Division of Occupational Safety and Health (Cal/OSHA) and the Cal/OSHA Standards Board to protect the health and safety of our employees.

2. Integration of Additional Requirements:

a. Timely Implementation: Upon receipt of any new or updated requirements related to workplace violence prevention, we will promptly evaluate their relevance to our organization and integrate them into our WVPP as needed.

b. Employee Awareness: Employees will be informed of any additional procedures, requirements, or information necessary for their health and safety as determined by regulatory authorities. This ensures that employees are aware of their roles and responsibilities in compliance with these standards.

3. Documentation and Records:

a. Records Maintenance: Records of any additional procedures or information required by regulatory authorities will be maintained and made accessible for compliance monitoring and audit purposes.

4. Continuous Improvement:

a. Feedback Mechanisms: We encourage employees to provide feedback and suggestions related to new procedures or standards. This feedback is valuable for ensuring that our WVPP remains robust and compliant with evolving regulatory requirements.

5. Training and Education:

a. Employee Training: If new procedures or standards necessitate additional training, we will ensure that employees receive the necessary instruction and information to perform their duties safely.

6. Proactive Approach:

a. Anticipating Change: We will proactively monitor regulatory developments related to workplace violence prevention and take a proactive approach to implement any necessary changes in our WVPP.

Our commitment to the health and safety of our employees extends beyond the requirements of this WVPP. We will actively engage with any additional procedures, standards, or information deemed necessary by regulatory authorities to protect our employees' well-being.

XV. RECORDING WORKPLACE VIOLENCE INCIDENTS IN THE VIOLENT INCIDENT LOG

Our commitment to workplace safety includes the thorough documentation of workplace violence incidents. This section outlines our procedures for recording and maintaining a Violent Incident Log, as required by regulatory standards:

1. Incident Documentation:

a. Recording Requirement: The employer shall maintain a Violent Incident Log that records information for every workplace violence incident, regardless of its nature or severity.

2. Information Sources:

a. Employee Input: Information recorded in the log will be based on input from employees who experienced the workplace violence incident, as well as witness statements and findings from investigations.

3. Protecting Personal Identifying Information:

a. Privacy Protection: To protect the privacy of individuals involved in a violent incident, personal identifying information that could reveal a person's identity, such as their name, address, electronic mail address, telephone number, or social security number, shall be omitted from the log.

4. Periodic Review:

a. Review Process: The Violent Incident Log shall be reviewed during the periodic reviews of the WVPP, as required in subparagraph (L) of paragraph (2) of subdivision (c).

5. Log Information:

The information recorded in the Violent Incident Log shall include the following details for each incident:

- The date, time, and location of the incident.
- The workplace violence type or types, as described in clause (iii) of subparagraph (B) of paragraph (6) of subdivision (a), 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:

- (i) Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - (ii) Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - (iii) Threat of physical force or threat of the use of a weapon or other object.
 - (iv) Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - (v) Animal attack.
 - (vi) Other.
- Consequences of the incident, including, but not limited to:
 - (i) Whether security or law enforcement was contacted and their response.
 - (ii) Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.

I. Log Completer Information:

Information about the person completing the log, including their name, job title, and the date when the log was completed.

By diligently maintaining a Violent Incident Log and adhering to these recording procedures, we aim to comprehensively document workplace violence incidents, protect employee privacy, and continually assess the effectiveness of our WVPP in safeguarding our employees.

XVI. TRAINING OF EMPLOYEEES WORKPLACE VIOLENCE PREVENTION

To ensure that all employees are equipped to recognize, prevent, and respond to workplace violence incidents effectively, we have established a comprehensive training program. This section outlines the training requirements and procedures that will be followed:

1. Training Content and Accessibility:

- a. Training Material: Our training material is carefully crafted to be appropriate in content and vocabulary for employees, considering their educational level, literacy, and language proficiency.

2. Initial Training:

- a. Frequency: Employees will receive initial training when the WVPP is first established and annually thereafter.
- b. Training Topics: The initial training will cover the following topics:
 - (A) An overview of the employer's plan, including how to obtain a copy at no cost, and how to participate in the development and implementation of the plan.
 - (B) Definitions and requirements outlined in this section.
 - (C) Procedures for reporting workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.

(D) Identification of workplace violence hazards specific to employees' job roles, the corrective measures implemented by the employer, guidance on seeking assistance to prevent or respond to violence, and strategies for avoiding physical harm.

(E) An explanation of the Violent Incident Log required by subdivision (d), and instructions on how to obtain copies of records as required by paragraphs (1) to (3) of subdivision (f).

(F) An opportunity for interactive questions and answers with a knowledgeable person regarding the employer's plan.

3. Additional Training:

a. Occasions for Additional Training: Employees will receive additional training when any of the following conditions are met:

- A new workplace violence hazard is identified.
- Changes are made to the WVPP.

b. Scope of Additional Training: The additional training may be limited to addressing the new workplace violence hazard or changes made to the plan. This targeted approach ensures that employees remain informed and prepared in response to evolving workplace conditions.

4. Training Records:

a. Documentation: Records of all training sessions will be maintained, including the date, content, attendees, and any additional relevant information.

5. Ongoing Commitment:

a. Continuous Training: Our commitment to workplace violence prevention includes ongoing education and training to ensure that all employees are well-informed and capable of contributing to a safe and secure work environment.

By providing comprehensive training to our employees, we aim to empower them with the knowledge and skills necessary to actively participate in the prevention and response to workplace violence incidents. Together, we can foster a safer and more secure workplace for all.

XVII. MAINTENANCE OF RECORDS / REQUESTING RECORDS

To ensure transparency, accountability, and compliance with workplace violence prevention measures, we maintain records of various aspects related to our WVPP. This section outlines our record-keeping procedures in accordance with regulatory standards:

1. Records of Workplace Violence Hazard Identification, Evaluation, and Correction:

a. Retention Period: Records related to the identification, evaluation, and correction of workplace violence hazards shall be created and maintained for a minimum of five years.

2. Training Records:

a. Retention Period: Training records, including but not limited to training dates, training content summaries, names and qualifications of training facilitators, and the names and job titles of all attendees, shall be created and maintained for a minimum of one year.

3. Violent Incident Logs:

a. Retention Period: Violent incident logs required by subdivision (d) shall be maintained for a minimum of five years.

4. Workplace Violence Incident Investigation Records:

a. Retention Period: Records of workplace violence incident investigations conducted pursuant to subparagraph (K) of paragraph (2) of subdivision (c) shall be maintained for a minimum of five years. These records will not contain "medical information" as defined in subdivision (j) of Section 56.05 of the Civil Code.

5. Accessibility of Records:

a. Division Access: All records required by this subdivision shall be made available to the Division of Occupational Safety and Health (Cal/OSHA) upon request for examination and copying.

b. Employee and Representative Access: All records required by paragraphs (1) to (3), inclusive, 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.

6. Record Maintenance:

a. Secure Storage: Records shall be securely stored to protect their integrity and confidentiality.

7. Data Protection:

a. Privacy Measures: Personal information, including "medical information" as defined in subdivision (j) of Section 56.05 of the Civil Code, will not be included in the records to safeguard individual privacy.

By diligently maintaining these records and ensuring their accessibility to authorized entities and individuals, we uphold our commitment to transparency and compliance with workplace violence prevention measures.

EXHIBIT – WORKPLACE VIOLENCE REPORTING FORM

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

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

To be completed by the individual investigating the incident. Return completed form within 2 days following the incident, to Risk Management. **Attach witness statements to this form.**

Reported by:

Date:

General Description:

Phone:

Date of Incident:

Time:

Address/Location of Incident:

Individuals involved in the incident (use additional sheet(s) if necessary)

Name:

Name:

Victim

Assailant

Victim

Assailant

Job Title:

Job Title:

Department:

Department:

Phone:

Phone:

Immediate Supervisor:

Immediate Supervisor:

Classification of Incident (Select One)

Type 1

Type 2

Type 3

Type 4

Committed by a person who has no legitimate purpose at the worksite.

Committed by a person who does have a legitimate purpose at the worksite.

Committed by a present or former employee, supervisor, or manager.

Committed by a person who does not work at the workplace, but has or is known to have had a relationship with an employee.

Classification of Incident Location (Select One)

At Workplace, Indoors
(Please include building
Name, Room Number)

At Workplace,
Outdoors (Please
Specify)

Other Area (Please
Explain)

Type of Incident

Physical Attack – no weapon/object

Physical Attack – with weapon/object

Threat or physical force and/or threat of use of weapon/object

Physical Assault – hitting, fighting, pushing, or shoving

Sexual Assault/threat (including rape, attempted rape, physical display, or unwanted verbal/physical sexual assault)

Other (specify)

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

Communicated directly to victim Verbal Mail Note Email

Communicated to another person Verbal Mail Note Email

Other (specify)

Initial Response or Follow up Activity (Check all that apply)

Situation diffused

Occupational Medicine notified

Security called

Law Enforcement notified
(if Yes, Name of Agency & Report Number)

First Aid Received?

Employee Assistance Program Resources
Provided?

Other (specify)

Describe Incident in Detail

(Include what happened, where, who was involved, what you heard, saw, etc. Also, include the circumstances at time of incident (i.e., was the employee completing usual job duties, was the area poorly lit, was the work being rushed, was the employee working during a low staffing level, was the employee isolated/alone, was the employee able to get help/assistance, was the employee working in a community setting, was the employee working in an unfamiliar/new location, other – please explain)

List names of Other Witnesses

Signature

Date:

Person Receiving Witness Statement:

Date:

Routing

Yes

No

Name

Signature

Date

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