



Elementary and High School Districts

Workplace Violence Prevention Plan (WVPP)

a component of the

[SRCS Injury & Illness Prevention Program \(IIPP\)](#)

Effective July 1, 2024

Table of Contents

1. Purpose and Authority	3
2. Person(s) Responsible for Implementing the WVPP	4
3. Procedures for Involving Employees in the Development and Implementation of the WVPP	6
4. WVPP Implementation and Coordination	7
5. Employee and Supervisor Training	7
6. Procedures to Ensure Employees Comply with the WVPP	8
7. Disciplinary Action	8
8. Identification and Mitigation of Workplace Violence Hazards	9
9. Employee Reporting of Workplace Threat or Act of Violence	9
10. Procedures to Accept & Respond to Reports of Workplace Violence	11
11. Recordkeeping	11
12. WVPP Definitions	12

1. Purpose and Authority

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 by evaluating and correcting workplace violence hazards, training employees and supervisors on workplace violence matters, creating and maintaining a violence incident log, and maintaining workplace violence incidents.

This plan is to include the following components:

1. Names or job titles of the persons responsible for implementing the plan. If there are multiple persons responsible for the plan, their roles shall be clearly described.
2. Procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan.
3. Methods that will be used to coordinate the implementation of the plan with other employers, when applicable, to ensure that those employers and employees understand their respective roles, as provided in the plan.
4. Procedures for the employer to accept and respond to reports of workplace violence and to prohibit retaliation against an employee who makes such a report.
5. Procedures to ensure that supervisory and nonsupervisory employees comply with the plan.
6. Procedures to communicate with employees regarding workplace violence matters, including, but not limited to, both of the following:
 - a. How an employee can report a violent incident, threat, or other workplace violence concern to the employer or law enforcement without fear of reprisal.
 - b. How employee concerns will be investigated.
7. Procedures to respond to actual or potential workplace violence emergencies, including, but not limited to, all of the following:
 - a. Means to alert employees of the presence, location, and nature of workplace violence emergencies.
 - b. Evacuation or sheltering plans that are appropriate and feasible for the worksite.
 - c. How to obtain help from staff assigned to respond to workplace violence emergencies, if any, security personnel, if any, and law enforcement.
8. Procedures to develop and provide employee training.
9. Procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic inspections to identify unsafe conditions and work practices and employee reports and concerns. Inspections shall be conducted:
 - a. When the plan is first established.
 - b. After each workplace violence incident.
 - c. Whenever the employer is made aware of a new or previously unrecognized hazard.

10. Procedures to correct workplace violence hazards identified above in a timely manner consistent with the IIPP, including:
 - a. Procedures for post-incident response and investigation.
 - b. Procedures to review the effectiveness of the plan and revise the plan, including:
 - i. Procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan.
11. Maintain a written log recording incidents of workplace violence.
- 12.

2. Person(s) Responsible for Implementing the WVPP

As the WVPP administrator, the Deputy Superintendent of Business Services has the authority and responsibility for overseeing the development, implementation, and maintenance of the WVPP.

The Director of Maintenance and Operations is responsible for hazard identification, safety inspections, coordinating emergency response to hazards, and maintenance of sites.

The Assistant Superintendent of Human Resources is responsible for convening regularly scheduled meetings of the WVPP and IIPP Committees.

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

Below is a list of current personnel in these positions and their contact information:

Responsible Persons	Job Title	WVPP Responsibility(ies)	Phone #	Email
Bob Marcucci	Deputy Superintendent, Business Services	Overall responsibility, enforcement, and investigating claims.	415 492-3205	bmarcucci@srcs.org
Darlene Avalos	Assistant Superintendent of Human Resources	Convenes WVPP Committee Meetings, posts minutes and agendas, supports training, and employee involvement.	415-492-3207	davalos@srcs.org
Dave Pedroli	Director of Maintenance and Operations	Hazard identification, mitigation, and response.	415-720-8283	dpedroli@srcs.org

Dr. Julio Villalobos	Bahia Vista Principal	Implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP	415-485-2415 Ext. 1100	jvillalobos@srcs.org
Alex Peck	Coleman Principal		415-485-2420 Ext. 1200	apecck@srcs.org
Michael Stachon	Davidson Principal		415-485-2400 Ext. 6000	mstachon@srcs.org
Jacob Hodgson	Glenwood Principal		415-485-2430 Ext. 1400	jhodgson@srcs.org
Katie O'Donnell	Laurel Dell Principal		415-485-2317 Ext.01003	kodonnell@srcs.org
Carolyn Reibel	San Pedro Principal		415-485-2450 Ext.3502	creibel@srcs.org
Kristin Hancock	Sun Valley Principal		415-485-2440 Ext. 1300	khancock@srcs.org
Armando Oseguera	Venetia Valley Principal		415-492-3150 Ext.2002	aoseguera@srcs.org
Donald Drake	Madrone HS Principal		415-485-2437	ddrake@srcs.org
Joe Dominguez	San Rafael HS Principal		415-4852330 Ext. 5001	jdominguez@srcs.org
Katy Dunlap	Terra Linda HS Principal		415-492-3101	kdunlap@srcs.org
Alison Baum	Early Learning Center Principal		TBD	abaum@srcs.org
Christy Novack	Director of Technology		415-492-3567	cnovack@srcs.org

Susan Akram	Director of Student Services		415-492-3528	sakram@srcs.org
Pepe Gonzalez	Director of Community Partnerships		415-492-3137	pgonzalez@srcs.org
Cecilia Perez	Assistant Superintendent, Education Services		415-492-3143	cperez@srcs.org
Carmen Ghysels	Superintendent		415 - 492-3233	cghysels@srcs.org

3. Procedures for Involving Employees in the Development and Implementation of the WVPP

Involving employees in the development and implementation of SRCS's WVPP is a critical component to the program's overall effectiveness. We welcome and encourage employees to participate in both the initial development and implementation as well as the ongoing and annual updates of the plan.

We will utilize the following procedures to involve employees in the development and implementation of this plan:

- As a step in the development and implementation of the WVPP, the DRAFT plan will be reviewed and discussed with authorized employee representatives (CSEA, SRTA and SRFT) at regularly scheduled meetings. Employee representatives will be asked to participate in the identification, evaluation, and correcting of workplace violence, in designing and implementation of training, and in reporting and investigating workplace violence.
- A WVPP committee is established as a sub-committee of the Injury Illness and Prevention Program (IIPP) committee, meets quarterly or more frequently as needed throughout the school year, and is open to all employees with broad representation across sites and departments. Please reach out to your supervisor if you are interested in participating.
- An employee [WVPP SURVEY](#) soliciting feedback and input on specific aspects around the development of the WVPP will be sent out after the opportunity for initial review and discussion of the DRAFT SRCS WVPP. After the initial plan is developed, the survey will be updated, and as a component of the annual back to school training and/or as any significant changes are made to the plan, employees will be able to give input and suggestions on an ongoing basis.

- Employees are also invited to submit any additional feedback and suggestions directly to the Deputy Superintendent of Business Services via email, telephone, or in-person meeting or to their supervisor (see [Section 2](#)).

4. WVPP Implementation and Coordination

It is critical to the implementation of this plan that SRCS employees understand that we all have individual and collective responsibility for bringing any concerns forward in a timely and appropriate manner. In order to ensure we understand our roles, all aspects of the plan, and how to report incidents or concerns around workplace violence, SRCS has established the following plan for implementation:

1. After an initial presentation of the DRAFT plan in the Spring of 2024 and a request for input, questions, and suggestions through a follow up survey, SRCS will further finalize the plan, and provide annual training as part of our mandated topics at the start of each school year.
2. SRCS will work with Keenan Safe Schools to utilize online modules that are developed, and include quizzes either individually or group training sessions, with follow up questions and answer sessions to verify comprehension and ensure an interactive process.
3. SRCS will share WVPP / IIPP meeting agendas and any pertinent information for changes or updates to the plan as determined by the WVPP committee.
4. As needed, the Human Resources Department will send out emails, newsletters, memos, or other means of communication, providing updates to all employees to support the development, implementation and /or updates of the WVPP, including timelines and next steps.

5. Employee and Supervisor Training

SRCS will provide employees and supervisors with initial training when the plan is first established and annually, or more frequently as needed, thereafter on all of the following:

1. The WVPP will be posted on the SRCS website.
2. The definitions and requirements of SB 553 (included in the WVPP).
3. How to report workplace violence incidents or concerns to us and/or law enforcement, without fear of reprisal.
4. Workplace violence hazards specific to employees' jobs, the corrective measures we have implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
5. A Workplace Violence Log and how to obtain copies of records.
6. An opportunity for interactive questions and answers with a person knowledgeable about the employer's plan.

Additional training shall be provided when a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. Additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Annual training will be provided to all employees through multiple channels including:

- Online courses through Keenan Safe Schools, with an interactive question and answer period.
- In-person training at a back-to-school event in August.
- New employee training, as needed.

6. Procedures to Ensure Employees Comply with the WVPP

While the Deputy Superintendent of Business Services is responsible for overseeing the development, implementation, and maintenance of the WVPP, all employees are responsible for adhering to their roles, responsibilities, and training provided under this plan. Supervisors will use the following procedures to ensure employees comply with the WVPP:

- Ensure employees take/attend the initial and annual WVPP training(s) and refresher training(s).
- Work with personnel to incorporate WVPP training into onboarding of new employees.
- Monitor employee adherence to topics and concepts covered in the training they received.
- Follow disciplinary action process if an employee or supervisor does not follow elements of this plan.

7. Disciplinary Action

SRCS will actively support all aspects of the WVPP. An employee who fails to adhere to the established procedures and practices of the plan may be disciplined following applicable CA Education Code, Board Policies/Administrative Regulations, and/or applicable Collective Bargaining Agreements and may include:

1. Retraining
2. Warning
3. Warning with reprimand placed in personnel file
4. Suspension from work with no compensation and record added to personnel file
5. Termination of employment, with a record added to the personnel file

Whenever an employee is disciplined for non-compliance with the WVPP, their supervisor, Deputy Superintendent of Business Services, or the Superintendent shall document the action taken.

8. Identification and Mitigation of Workplace Violence Hazards

Consistent with the IIPP, the District conducts periodic inspections to identify, evaluate, and correct unsafe conditions. Specifically related to the WVPP, the District will conduct workplace violence hazards inspections:

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

And any identified hazards will be corrected.

Employees who have identified a workplace hazard are to report the situation to their supervisor or the Deputy Superintendent of the Business Services (see [Section 2](#)) or complete the [WORKPLACE HAZARD IDENTIFICATION FORM](#).

9. Employee Reporting of a Workplace Threat or Act of Violence

Any employee who observes or experiences an imminent threat or an act of violence should call 911 and take steps to ensure their immediate personal safety.

Employees at SRCS schools and the District Office will follow site-specific notification systems, and shelter-in-place, lockdown, and evacuation procedures. Initial notification of potential or observed violence and necessary protective actions may be through public address system, intercom, cell phones, radio, walkie talkie, classroom or campus phones, etc.

When safe to do so, the employee needs to begin the District's reporting process as outlined below.

Employees who have identified an incident, threat, or concern related to workplace violence are to report the situation to their supervisor or the Deputy Superintendent of Business Services (see [Section 2](#)).

In addition to verbal reporting, the employee is to complete the [WORKPLACE VIOLENCE REPORTING FORM](#).

As an alternative to completing the form, the reporting employee can instead respond to the following prompts and submit their written documentation to their supervisor or the Deputy Superintendent of Business Services (see [Section 2](#)):

1. Date:
2. Time:
3. Location:

4. Type of workplace violence:
 - a. **Type 1** = Committed by a person who has no legitimate purpose at the worksite
 - b. **Type 2** = Committed by a person who does have a legitimate purpose at the worksite (customer, client, patient, student, inmate, or visitor).
 - c. **Type 3** = Committed by a present or former employee, supervisor, or manager.
 - d. **Type 4** = Committed by a person who does not work at the workplace but has or is known to have had a relationship with an employee
5. Circumstances at the time of the incident, including but not limited to the following:
 - a. Was the employee completing usual job duties?
 - b. Was the area poorly lit?
 - c. Was the work being “rushed”?
 - d. Was the employee working during a low staffing level?
 - e. Was the employee isolated/alone?
 - f. Was the employee able to get help/assistance?
 - g. Was the employee working in a community setting?
 - h. Was the employee working in an unfamiliar/new location?
 - i. Other: please explain.
6. Classification of where the incident occurred:
 - a. At the workplace, indoors (please include building name and/or room number).
 - b. At the workplace, outdoors (please specify).
 - c. Other area (please explain).
7. Type of incident (including but not limited to):
 - a. Physical attack – no weapon/object.
 - b. Physical attack – with a weapon/object.
 - c. Threat of physical force or threat of use of a weapon/object.
 - d. Sexual assault/threat (including rape, attempted rape, physical display, or unwanted verbal/physical sexual contact).
 - e. Other (please specify):

If assistance is needed to complete the form or document the incident, the reporting employee can reach out to any person listed in [Section 2](#).

Please note that:

- Workplace violence does not include lawful acts of self-defense or defense of others.
- All employees are encouraged to report any concerns or incidents related to workplace violence and can do so without fear of reprisal.
- 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.

10. Procedures to Accept & Respond to Reports of Workplace Violence

Once an imminent threat or act of violent incident is reported, the Deputy Superintendent of Business Services or designee will adhere to the following process for accepting and responding to reports of workplace violence:

1. Ensure the [WORKPLACE VIOLENCE REPORTING FORM](#) has been completed.
2. Determine any steps that need to be taken to protect the reporting employee, or any other employee, against an immediate threat of violence.
3. Investigate the report to gather all relevant information, including gathering all relevant information, interviewing employees and any witnesses, visiting the location, documenting evidence, asking follow-up questions, and determining if law enforcement contacted (if so, what was their response):
4. After the investigation, findings will be determined and evaluated to identify the root cause.
5. Appropriate corrective actions will be taken to address the root cause and, if necessary, implement disciplinary processes defined in CA Education Code, Board Policies/Administrative Regulations, and/or applicable Collective Bargaining Agreements.
6. Coordinate with the involved departments and staff to implement the corrective actions.
7. Communicate the findings and corrective actions back to the reporting employee.
8. The effectiveness of the corrective actions will be monitored by assigned supervisors.
9. Document the incident and all correlating information in the [WORKPLACE VIOLENCE LOG](#) for recordkeeping and reporting purposes.

11. Recordkeeping

A safe and healthy workplace is the goal of everyone at SRCS, with responsibility shared by management and staff alike.

The Deputy Superintendent of Business Services will be responsible for ensuring that all relevant records are completed, maintained, and made available upon request as required by this program and/or Cal/OSHA.

All required records required will be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request.

Forms

- The [WORKPLACE HAZARD IDENTIFICATION FORM](#) will include the identification, evaluation, and correction of a workplace hazard. The form will be maintained for a minimum of five years.

- The **TRAINING RECORD** will include 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. The record will be maintained for a minimum of one year.
- The **WORKPLACE VIOLENCE REPORTING FORM** is to be used by employees who have identified an incident, threat, or concern related to workplace violence. The report form will be maintained for a minimum of five years.
- The **WORKPLACE VIOLENCE LOG** will include information about workplace violence reports, investigations, and follow-up. The log will not include personal identifying information or “medical information,” as defined in subdivision (j) of Section 56.05 of the Civil Code. The log will be maintained for a minimum of five years.

12. WVPP 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.

Hazard - A source of potential harm to someone in the work environment. It can be an object or activity that has the likelihood to cause or make the environment conducive to injuries under specific conditions.

Log - The violent incident log is required by LC section 6401.9.

Plan - The workplace violence prevention plan is required by LC section 6401.9.

Serious injury or illness - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

Threat of violence - Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

Workplace violence - Any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:

Type 1 violence - Workplace violence committed by a person who has no legitimate business at the worksite, and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

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

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

Type 4 violence - Workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee. Workplace violence does not include lawful acts of self-defense or defense of others.

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