

# Walnut Valley Unified School District Walnut High School

## WRITTEN WORKPLACE VIOLENCE PREVENTION PLAN for GENERAL INDUSTRY (NON-HEALTHCARE SETTINGS)

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

Use of this template does not ensure compliance with LC section 6401.9. Employers are liable for any violations of LC section 6401.9 regardless of the use of this model/template. A valid plan must obtain the active involvement of employees and their authorized employee representatives in developing and implementing the plan. The district wide Safety Committee will review the complete plans from each site.



Walnut Valley Unified School District

in Conjunction with

Cal/OSHA Publications Unit

February 2024



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# WORKPLACE VIOLENCE PREVENTION PROGRAM

## Walnut Valley Unified School District

### Walnut High School

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](#).

**Date of Last Review:** July 1, 2024

**Date of Last Revision(s):** July 2, 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 that are used to reduce workplace violence hazard effectively

## RESPONSIBILITY

The WVPP administrator, Robby Jung, Director of Human Resources, has the authority and responsibility for implementing the provisions of this plan for Walnut Valley Unified School District. 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                                                    |
|---------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------|
| Robby Jung          | Director, Human Resources | <i>Approves the final plan and any major changes.</i>                                                                                                                                                                                                             | (909) 595-1261<br>ext. 43416  | <a href="mailto:rjung@wvusd.org">rjung@wvusd.org</a>     |
| Carrie Yee          | Risk Management           | <b>Responsible for employee involvement and training;</b><br><i>Carrie organizes safety meetings, updates training materials, and handles any reports of workplace violence.</i>                                                                                  | 1-909-595-126<br>1 Ext. 31332 | <a href="mailto:cyee@wvusd.org">cyee@wvusd.org</a>       |
| Conchita Cawley     | Operations Manager        | <b>Responsible for emergency response, hazard identification, and coordination with other employers;</b> Our Operations Team <i>conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.</i> | (909) 594-1333<br>ext. 43640  | <a href="mailto:ccawley@wvusd.org">ccawley@wvusd.org</a> |

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

Walnut Valley 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 periodic safety meetings with employees and their representatives to discuss the 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, possible scenarios, and reviews of safety procedures).

- Designing and implementing training
  - Each year Risk Management will assign Workplace Violence Prevention training through the ASCIP E-Learning Platform and other mandated trainings to be completed before the end of September.
  - Other site-level 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 might suggest a new training scenario based on a recent incident.
  - Reporting and investigating workplace violence incidents. Each workplace violence report will be reported by completing the Google Form which automatically is forwarded to Risk Management and Human Resources Leadership. Each incident will have a follow-up conversation with site leadership to ensure a plan is in place to help victims and the correct reporting has occurred (police, CPS, etc.). Example scenarios can be developed and shared at monthly principal meetings or in the weekly updates sent to principals. These scenarios can then be shared with site staff to ensure a plan is in place to address possible scenarios that could arise throughout the year.
- Management will ensure that all workplace violence policies and procedures within this written plan are 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 ensures 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 that create a security hazard for others in the workplace, including at a minimum:

- Training employees, supervisors, and managers in the provisions of the WVUSD Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.

The plan will be part of the annual meetings the district holds for the Leadership team (Carwash).

- 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 recognizing individual sites at the district-level safety meetings.
- Potential discipline for employees who fail to comply with the WVPP.

## 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 (NEO) includes workplace violence prevention policies and procedures. NEO is held the Friday before the first day of school. There is a second NEO for all new Classified employees held each February.
- 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.
  - Utilizing the scenarios provided to maintain open communication keep regular review of the policies on reporting and continue reviewing best practices
  - For example, ensure that supervisors and employees can communicate effectively and in the employees' first language.
- Posted or distributed workplace violence prevention information. The plan for each site will be completed on a Google Doc and accessible to District leadership and site personnel.
- 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, or other violence concerns by utilizing the QR code below



- The incident reported is automatically forwarded to Risk Management and Human Resources Leadership. The incident will be reviewed with site leadership and a plan to address the incident will be made in collaboration with District and Site Leadership.
- 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 promptly and they will be informed of the results of the

investigation in writing or in person along with any corrective actions to be taken.

Updates on the status of investigations and corrective actions are provided to employees through email and at safety meetings. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.

Updates during daily/weekly/monthly/quarterly meetings with other employers in the building (at or near and around the same worksite) to discuss the plan and any updates. These meetings could involve sharing updates to the plan, discussing recent incidents, and coordinating training sessions.

Sharing training materials and incident reports with other employers to ensure a coordinated response to any incidents. This could involve sending copies of training materials and incident reports to other employers.

## **WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

WVUSD 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 or email. If that's not possible, employees will report incidents directly to the WVPP administrator, Robby Jung, Director of Human Resources, and/or Carrie Yee, Risk Management.
- Employees can report incidents to their supervisor, HR, or through the Let's Talk app on the District Website. [Let's Talk](#)
- Workplace Violence Reporting Form: <https://forms.gle/WR77gzNnjakWG7766> or utilize the QR Code



A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. An employee who retaliates against a coworker for reporting an incident could face discipline or possibly termination.

## **EMERGENCY RESPONSE PROCEDURES**

WVUSD 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. The alarms could be audible, visual, or both utilizing the two-way PA systems in the classrooms and offices across the district.

- WVUSD has evacuation or sheltering plans. Each school site has an Emergency plan and routinely

practices drills that include sheltering in place and evacuation.

- How to obtain help from staff, security personnel, or law enforcement
  - a. Contact Site Administration
  - b. Contact CSO (high school level)
  - c. Contact District WVPP Leadership (Robby Jung)
  - d. Contact law enforcement 911

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

| Responsible Persons | Job Title/Position | WVPP Responsibility(ies)                                                                                                                                                                                                                            | Phone #                   | Email                                                    |
|---------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|----------------------------------------------------------|
| Conchita Cawley     | Operations Manager | Responsible for emergency response, hazard identification, and coordination with other employers; Our Operations Team conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan. | (909) 594-1333 ext. 43640 | <a href="mailto:ccawley@wvusd.org">ccawley@wvusd.org</a> |

## WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by WVUSD 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:

- o Daily or weekly review of all submitted and reported concerns from the [WVPP Google Form](#)
- o Review any submissions in the District “Let’s Talk” database
- o 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:

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                                                   |
|--------------------------------|-------------------------------------------------------------------------------------|
| Conchita Cawley                | As the site lead, this person checks in with site personnel to ensure that the site |

| Specific Person Name/Job Title              | Area/Department/Specific location                                                                                                        |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
|                                             | is safe and secure                                                                                                                       |
| Ronald Honore, Custodian II                 | As the site lead custodian, this person checks on the condition of the physical site and reports areas of concern to the lead            |
| Christopher Torres, Campus Security Officer | As the Campus Security Officer, this person secures the physical site and reports security concerns to the site lead.                    |
| Andrea Poma, Assistant Principal            | As the administrator responsible for GLCs, this person checks in with the GLCs to ensure students avoid negative interactions with staff |

Inspections for workplace violence hazards include assessing:

Describe factors specific to the workplace that may result in risk of workplace violence.

- The need for violence surveillance measures, such as whether the cameras are working
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency alarms
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Employees have access to a telephone with an outside line. (Dial 8 first)
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
- Review the process for visitors to check in through the main office and that the Vercada software is working correctly.
- Employees' skill in safely handling threatening or hostile service recipients (example: CSO's and front office staff).
- 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.

## WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected promptly. WVUSD 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 and or communication devices.
- All corrective actions taken will be documented and dated on the appropriate forms. The digital forms are automatically saved and reported to Risk Management and Human Resources.
- Corrective measures for workplace violence hazards will be specific to a given work area.
  - Make the school site unattractive to outsiders by being visible at points of entry and during supervision of events.
  - Improve lighting around and at the school site. Report any outages as soon as possible.
  - Post signs that cameras are monitoring the facility.
  - Post emergency telephone numbers for law enforcement, fire, and medical services.
  - Control, 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.
  - Ensure employees have access to a telephone with an outside line. Provide employee training/retraining (refreshers) on the WVPP, which could include but not limited to the following:
    - Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
    - 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.
  - 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 risk factors 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 ensure corrective actions are taken
- Obtain any reports completed by law enforcement (always ask law enforcement for an incident number)
- The [violent incident log](#) will be used for every workplace violence incident and will include information, such as:
  - 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 family or friend of an employee, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
  - 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

- o 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
- Review all previous incidents

Ensure no personal identifying information is recorded or documented in the written investigation report. This includes information that would reveal the 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 possible changes to the plan

WVUSD 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 the development and implementation of the employer's plan
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal
- Workplace violence hazards specific to the employees' jobs, the corrective measures WVUSD has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm
- Opportunities WVUSD has for interactive questions and answers with a person knowledgeable about the WVUSD plan
- Strategies to avoid/prevent workplace violence and physical harm, such as:
  - o How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence
  - o 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 is provided in the event of any violent act upon an employee
- Post-event trauma counseling for employees desiring such assistance.

**Note:** WVUSD will provide training through ASCIP's E-Learning Learning platform at the beginning of each school year along with other mandatory training.

## EMPLOYEE ACCESS TO THE WRITTEN WVPP

WVUSD ensures that the WVPP plan shall be available in writing and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by placing a physical copy of the site plan in the front office of each work site. A specific QR Code for each site plan will be displayed on the front cover of the physical site plan for digital access.

- We will provide access through a Google website, which allows an employee to review, print, and email the current version of the WVPP. - [WVUSD Workplace Violence Prevention Website](#)



## RECORDKEEPING

WVUSD will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction for five years minimum.
- Create and maintain training records for a minimum of one (1) year and include the following:
  - Training dates (Completed through ASCIP record keeping)
  - Contents or a summary of any 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 a minimum of five (5) years.
- Maintain records of workplace violence incident investigations for five (5) years minimum.
  - 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 and their representatives, 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 WVUSD 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 WVUSD 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](#), WVUSD 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 connection with any employment.

“I, Conchita Cawley, Operations Manager of WVUSD and Walnut High School, 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 these policies and procedures will help us achieve that goal.”

|                 |                                           |
|-----------------|-------------------------------------------|
| Conchita Cawley | Operations Manager                        |
| Printed Name    | Title of the person authorizing this WVPP |

|                                               |                   |
|-----------------------------------------------|-------------------|
|                                               | July 2, 2024      |
| Signature of the person authorizing this WVPP | Date of Signature |

## [Violent Incident Log](#)



This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:

- Names
- Addresses – physical and electronic
- Telephone numbers
- Social security number

## [Frequently Asked Questions about Workplace Violence Prevention in General Industry \(Non- Health Care settings\)](#)

## [Cal/OSHA Workplace Violence Prevention Guidance and Resources](#)