Novato Unified School District



NOVATO UNIFIED SCHOOL DISTRICT

Workplace Violence Prevention Plan

September 20, 2024

This is a component of the Novato Unified School District Injury, Illness and Prevention Program posted on the Novato Unified School District Website

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1. 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:

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. Effective 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. Effective procedures should be implemented 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. Effective procedures to ensure that supervisory and nonsupervisory employees comply with the plan.
6. Effective 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. Effective procedures to respond to actual or potential workplace violence emergencies, including, but not limited to, all of the following:
    a. Effective 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.

2. Person(s) Responsible for Implementing the WVPP

The ultimate responsibility for overseeing the development, implementation, and maintenance of the WVPP rests with the Executive Director of Human Resources.

The WVPP administrator, Executive Director of Human Resources, has the authority and responsibility to implement the provisions of this plan for the Novato Unified School District.

In addition, the Director of Maintenance and Operations is responsible for hazard identification, safety inspections, coordinating emergency response to hazards, and maintenance of sites. The Human Resources Director and the Maintenance and Operations Director are responsible for convening regularly scheduled meetings of the WVPP and IIPP Committees.

Here is a list of current personnel in these positions, and contact information for each:

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Francesca Whitcomb	Executive Director of Human Resources	Overall responsibility, enforcement, and investigating claims.	415 493-4220	fwhitcomb@nusd.org
JC van Rooyen	Director of Maintenance, Operations and Transportation	Hazard identification, mitigation and response	415 493-4575	jvanrooyen@nusd.org
Francesca Whitcomb JC van Rooyen	Executive Director of Human Resources Director of Maintenance, Operations and Transportation	Convenes WVPP Committee Meetings, posts minutes and agendas, supports training, and employee involvement	415 493-4220 415 493-4575	fwhitcomb@nusd.org jvanrooyen@nusd.org

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

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

Involving employees in the development and implementation of our 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 (NFT and CSEA) 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, which meets regularly throughout the school year and is open to all employees as assigned, with broad representation from multiple departments across the organization as the goal, including student programs and support departments. Please reach out to your supervisor if you are interested in participating.
- The WVPP committee will meet quarterly or more frequently as needed at dates and times to be determined.
- An employee survey soliciting feedback and input on specific aspects around the development and implementation of the plan, and will be updated and sent out annually.
- Employees are also invited to submit their ideas directly to the Executive Director of Human Resources via email, telephone, or an in-person meeting.
- An anonymous suggestion box is available in Human Resources. Anonymous suggestions may also be submitted through the annual survey.
- Any additional feedback and suggestions are always welcome at staff and departmental meetings.

4. WVPP Implementation and Coordination

It is critical to the implementation of this plan that Novato Unified School District 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, Novato Unified School District has established the following plan in place for implementation:

1. After an initial presentation of the DRAFT plan in the Spring of 2024, and request for input, questions and suggestions through a follow up survey, Novato Unified School District finalized the plan and annual training will be provided.
2. Novato Unified School District 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. Novato Unified School District 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 plan, including timelines and next steps.

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

Any employee who observes an imminent threat or act of violence should call 911 and take steps to ensure their immediate personal safety. All Novato Unified School District campuses, programs, classrooms on district campuses, and administrative offices, will follow site-specific notification systems, and shelter-in-place, lockdown and evacuation procedures in site specific safety plans. 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, employees should report concerns about workplace violence directly to the Executive Director of Human Resources , who will adhere to the following process for accepting and responding to reports of workplace violence:

1. The reporting employee will be asked to complete a **WORKPLACE VIOLENCE REPORTING FORM** (See Section 8, Employee Communication, for information that must be included in this report).
2. Once the report has been completed and received, the Executive Director of Human Resources or their designee will take action in conducting an investigation into the threat, including gathering all relevant information, interviewing employees, visiting the location, documenting evidence, and asking follow-up questions.
3. After the investigation, findings will be determined and evaluated to identify the root cause.
4. Appropriate corrective actions will be taken to address the root cause, if necessary following disciplinary processes defined in collective bargaining agreements.
5. The Executive Director will coordinate with the involved departments and staff to implement and ensure corrective actions.
6. The findings and corrective actions will be communicated back to the reporting employee.
7. The effectiveness of the corrective actions will be monitored by assigned supervisors.
8. The incident and all correlating information will be documented in the "Workplace Violence Log" for recordkeeping and reporting purposes.

   All employees are encouraged to report any concerns or incidents related to workplace violence, and that they can do so without fear of reprisal.

   Additional detailed procedural steps are outlined in the Employer's Evaluation & Response section in detail. To navigate to this section click here.

6. Procedures to Ensure Compliance with the WVPP

While the Executive Director of Human Resources 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 our established disciplinary action process if an employee or supervisor does not follow elements of this plan.

7. Disciplinary Action

Novato Unified School District will actively support all aspects of the WVPP. An employee that fails to adhere to the established procedures and practices of the plan may be disciplined following Novato Unified School District Board and/or Superintendent Policy, Administrative Procedures, and 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, Executive Director of Human Resources, or Superintendent shall document the action taken.

8. Employee Communication

As noted in Section 5, any employee who observes an imminent threat or act of violence should call 911 and take steps to ensure their immediate personal safety. When safe to do so, and completing a **WORKPLACE VIOLENCE REPORTING FORM**, please include the following information (please note that workplace violence does not include lawful acts of self-defense or defense of others):

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):

An employee may also use the form contained within the WVPP plan or the fillable form found here to report any workplace violence incidents:

WORKPLACE VIOLENCE REPORTING FORM

9. Employer's Evaluation & Response

When responding to a report of workplace violence the Executive Director of Human Resources or their designee will adhere to the following process:

1. Determine any steps that need to be taken to protect the reporting employee, or any other employee, against an immediate threat of violence.
2. Investigate the report to gather all relevant information (interview employees, visit the location, document evidence, ask follow-up questions), including capturing the following information:
    a. Consequences of the incident (including but not limited to):
        i. Was security or law enforcement contacted?
            1. If so, what was their response:
        ii. Actions taken to protect employees from a continuing threat or any other hazards resulting from the incident:
        iii. Information of other victim(s) with a request for them to make a statement or complete a separate report
    b. Information about the person completing the employer's response/log:
        i. Name
        ii. Title
        iii. Date

3. Evaluate the findings to identify the root cause.
4. Define corrective actions/steps to be taken to address each cause.
5. Coordinate with the necessary departments/staff to implement the corrective actions.
6. Communicate your findings and corrective actions back to the reporting employee.
7. Monitor the effectiveness of the corrective actions.
8. Document the incident and all correlating information in the "Violent Incident Log" for recordkeeping and reporting purposes.

10. The Workplace Violence Reporting Form

This form is to be used by employees who have identified an incident, threat, or concern related to workplace violence. In addition to verbal reporting, this form brings the issue and specific details to the attention of the 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.

WORKPLACE VIOLENCE REPORTING FORM

- A printable version can be found in Section 14 below.

11. Employee and Supervisor Training

Novato Unified School District 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. Where to find a copy of the WVPP at no cost. The plan will be a component of the Novato Unified School District's IIPP which is posted on the Novato Unified School District website.
2. The definitions and requirements of SB 553, which are 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.
- New employee training, as needed

12. Recordkeeping

Records of workplace violence hazard identification, evaluation, and correction will be created and maintained for a minimum of five years. This information will be captured through the Notice of Hazard/Safety Concern form (also Exhibit B in the Injury and Illness Prevention Plan.)

Training records will be created and maintained for a minimum of one year and include training dates (link to form for training records), 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.

Violent incident logs will be maintained for a minimum of seven years in the Workplace Violence Log.

Records of workplace violence incident investigations will be maintained for a minimum of seven years. These records shall not contain "medical information," as defined in subdivision (j) of Section 56.05 of the Civil Code.

All records required above 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.

The Executive Director of Human Resources 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. A safe and healthy workplace is the goal of everyone at Novato Unified School District, with responsibility shared by management and staff alike.

Novato Unified School District Workplace Violence Log

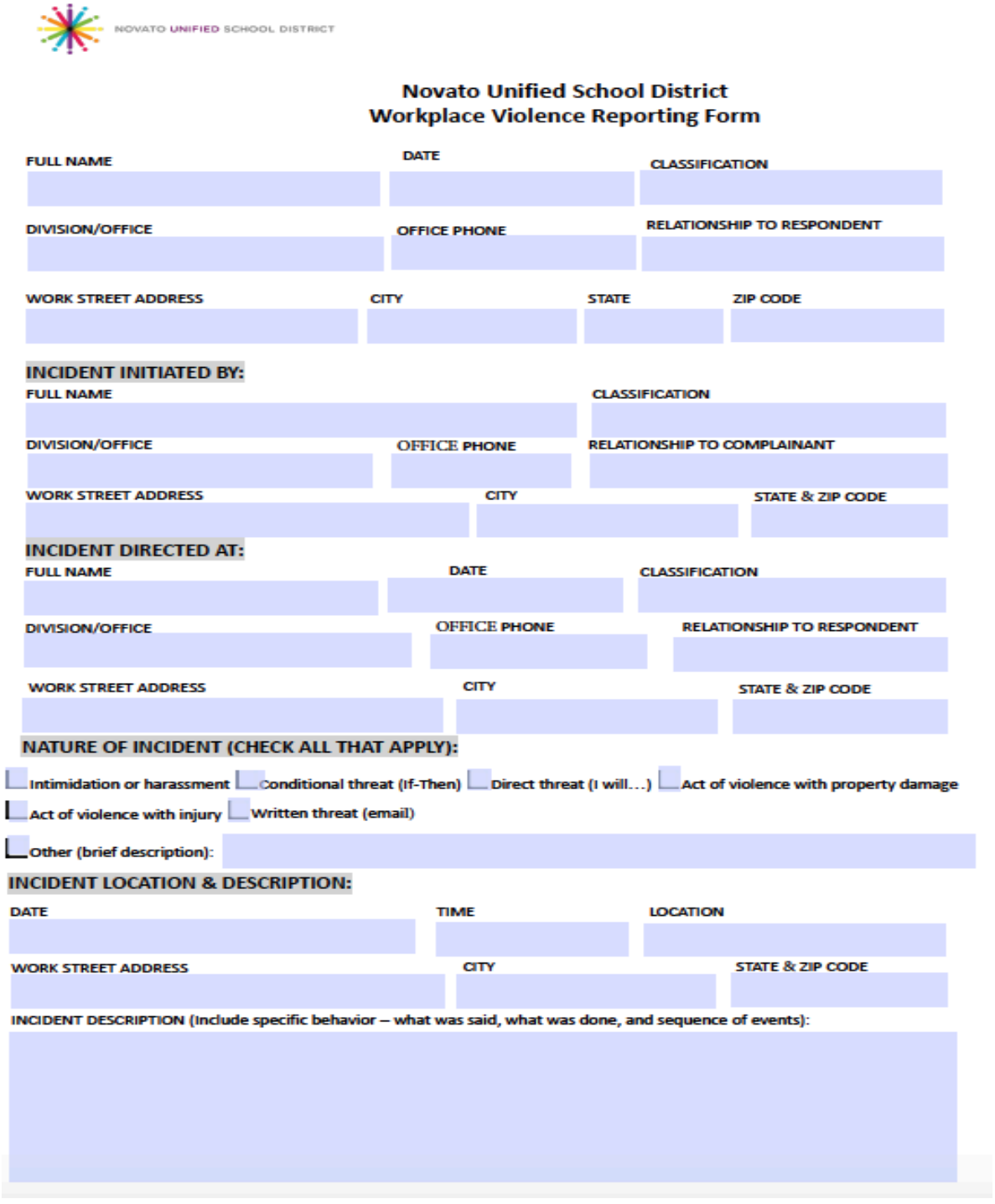
Hamilton TK-8 School, 5530 Nave Drive, 94949; Loma Verde Elementary School, 399 Alameda de la Loma, 94949; Lu Sutton Elementary School, 1800 Center Road, 94947; Lynwood Elementary School, 1320 Lynwood Dr., 94947; Olive Elementary School, 620 Olive Avenue, 94945; Pleasant Valley Elementary School, 755 Sutro Avenue, 94947; Rancho Elementary School, 1430 Johnson Street, 94947; San Ramon Elementary School, 45 San Ramon Way, 94945; San Jose Middle School, 1000 Sunsent Parkway, 94949; Sinaloa Middle School, 2045 Vinyard Road, 94947; Novato High School, 625 Arthur Street, 94947; San Marin High School, 15 San Marin Drive, 94945; Hill Education Center, 720 Diablo Avenue, 94947; Early Intervention, 1430 Johnson Street, 94947

		Section 1: Incident Details			Section 2: Nature of Workplace Violence		Section 3: Perpetrator Information (NO personally identifiable information)	Section 4: Circumstances at the Time of the Incident	Section 5: Incident Location	Section 6: Type of Incident	Section 7: Consequences of the Incident	Section 8: Follow-up Actions			Information on Person Recording Log Entry Section 9: Log Completer Information					
Log Entry Number	Log Entry Date	Date:	Time:	Location:	Type(s) of Workplace Violence:	Detailed Description of the Incident:	Classification of Who Committed the Violence:	Circumstances:	Location of Incident:	Type of Incident:	Consequences:	Actions taken to protect employees:	Security or law enforcement contact:	Response of security or law enforcement:	Log Completed By:	Job Title:	Date Completed:	Job Title:	Phone #:	Email:

13. General Safety Training Record Log

(See Appendix C of Injury Illness and Prevention Program)

14. Workplace Violence Reporting Form



NOVATO UNIFIED SCHOOL DISTRICT

Novato Unified School District
Workplace Violence Reporting Form

FULL NAME | DATE | CLASSIFICATION

DIVISION/OFFICE | OFFICE PHONE | RELATIONSHIP TO RESPONDENT

WORK STREET ADDRESS | CITY | STATE | ZIP CODE

INCIDENT INITIATED BY:

FULL NAME | CLASSIFICATION

DIVISION/OFFICE | OFFICE PHONE | RELATIONSHIP TO COMPLAINANT

WORK STREET ADDRESS | CITY | STATE & ZIP CODE

INCIDENT DIRECTED AT:

FULL NAME | DATE | CLASSIFICATION

DIVISION/OFFICE | OFFICE PHONE | RELATIONSHIP TO RESPONDENT

WORK STREET ADDRESS | CITY | STATE & ZIP CODE

NATURE OF INCIDENT (CHECK ALL THAT APPLY):

☐ Intimidation or harassment ☐ Conditional threat (If-Then) ☐ Direct threat (I will…) ☐ Act of violence with property damage

☐ Act of violence with injury ☐ Written threat (email)

☐ Other (brief description):

INCIDENT LOCATION & DESCRIPTION:

DATE | TIME | LOCATION

WORK STREET ADDRESS | CITY | STATE & ZIP CODE

INCIDENT DESCRIPTION (Include specific behavior – what was said, what was done, and sequence of events):

Type of Violence:

- ☐ Type 1: Committed by a person who has no legitimate purpose at the worksite.
- ☐ Type 2: Committed by a person who does have a legitimate purpose at the worksite) customer, client, student, or visitor).
- ☐ Type 3: Committed by a present or former employee, supervisor, or manager.
- ☐ 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.

Circumstances at the time of the incident, including but not limited to the following:

Was the employee completing usual job duties?	Yes ☐	No ☐
Was the area poorly lit?	Yes ☐	No ☐
Was the work bring "rushed"?	Yes ☐	No ☐
Was the employee working during a low staffing level?	Yes ☐	No ☐
Was the employee isolated or alone?	Yes ☐	No ☐
Was the employee able to get help/assistance?	Yes ☐	No ☐
Was the employee in a community setting?	Yes ☐	No ☐
Was the employee working in a new or unfamiliar location?	Yes ☐	No ☐

☐ Other: Please explain _____

Classification of where the incident occurred:

- ☐ At the workplace, indoors (please include building name and or room)
- ☐ At the workplace, outdoors
- ☐ Other: Please explain _____

Type of incident (including but not limited to):

- ☐ Physical attack – no weapon/ object.
- ☐ Physical attack – with a weapon/ object.
- ☐ Threat of physical force or threat of use of a weapon/object.
- ☐ Sexual assault/threat (including rape, attempted rape, physical display, or unwanted verbal/ physical contact).
- ☐ Other (please specify): _____

ASSOCIATED INDIVIDUALS (CHECK ALL THAT APPLY):

☐ Witness ☐ Injured Name: _____ Department: _____

☐ Witness ☐ Injured Name: _____ Department: _____

☐ Witness ☐ Injured Name: _____ Department: _____

☐ Witness ☐ Injured Name: _____ Department: _____

LAW ENFORCEMENT AGENCIES (IF APPLICABLE)

AGENCY	CASE NUMBER
AGENCY	CASE NUMBER

POST-INCIDENT ACTIONS

SUPERVISORY ACTIONS TO DATE:

Full Name | ATO Start Date | ATO End Date

☐ ATO Action Required

Full Name | ATO Start Date | ATO End Date

☐ ATO Action Required

Reason for Administrative Time Off (ATO):

Management Unit Recommendation for Remedy:

POST-INCIDENT ACTIONS

File Status

☐ Active

☐ Closed

☐ Investigation

Date Closed

Investigated by

Remedy

Date Opened

Date Completed

15. 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.

Log - The violent incident log is required by LC section 6401.9. (Link to Novato Unified School District Workplace Violence log).

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.