

Imperial Unified School District

Injury and Illness Prevention Plan

Workplace Violence Prevention Plan

Last Updated: June, 2024

POLICY STATEMENT

The Imperial Unified School District ("District") has developed the Injury and Illness Prevention Program ("IIPP") in accordance with California Labor Code section 6401.7 and the Workplace Violence Prevention Plan ("WVPP") required by Labor Code section 6401.9. Please review Board Policy and Administrative Regulation 4157, *Employee Safety*, for additional information.

WVPP definitions:

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.

The WVPP considers the following four major types of workplace violence as hazardous:

1. Type I workplace violence involves a violent act committed by a person with no legitimate relationship to the workplace who enters the workplace with the intent to commit a crime.
2. Type II involves a violent act or threat of violence directed at District employees by customers, clients, patients, students, inmates, or visitors.
3. Type III involves a violent act or threat of violence against an employee by a present or former employee, supervisor, or manager.
4. Type IV involves workplace violence committed in the workplace by someone who does not work there but has or is known to have had a personal relationship with an employee.

The District is committed to promoting a safe and healthy work environment for all employees, students and visitors. While it is impossible to eliminate all risks, the IIPP and WVPP are intended to reduce the risk of harm and set forth the guidelines for responding to hazardous/dangerous incidents.

RESPONSIBILITY

Roger Ruvalcaba, Assistant Superintendent, is the IIPP and WVPP Administrator and has the authority and responsibility for implementing all relevant provisions for the District.

All managers and supervisors are responsible for implementing and maintaining the IIPP and WVPP in their work areas and for answering worker questions about both programs.

The following procedures have been used to obtain the active involvement of District employees to develop and implement the WVPP:

1. Employee participation in identifying, evaluating and correcting workplace violence hazards.
2. Conducting interactive safety meetings.

3. Responding to reports of workplace hazards and incorporating outcomes into the plan.
4. Training all employees in accordance with the WVPP requirements.

COMPLIANCE

All workers, including managers and supervisors, are responsible for complying with safe and healthful work practices. Our system of ensuring that all workers comply with these practices include one or more of the following practices:

1. Informing workers of the provisions of our IIPP and WVPP.
2. Evaluating the safety performance of all workers.
3. Recognizing employees who perform safe and healthful work practices.
4. Providing training to workers whose safety performance is deficient.
5. Disciplining workers for failure to comply with safe and healthful work practices.

COMMUNICATION

All managers and supervisors are responsible for communicating with all workers about occupational safety and health in a form readily understandable by all workers. Our communication system encourages all workers to inform their managers and supervisors about workplace hazards without fear of reprisal. All workplace hazards will be reported to the IIPP/WVPP Administrator.

Our communication system includes one or more of the following:

1. New worker orientation including a discussion of safety, health, and workplace violence prevention policies and procedures.
2. Review of our IIPP including the WVPP.
3. Workplace safety, health, and violence training programs.
4. Regularly scheduled safety meetings.
5. Posted or distributed safety information.
6. A system for workers to report workplace hazards without fear of reprisal.

WORKPLACE VIOLENCE EMERGENCIES

Employees may be alerted to workplace violence in a variety of ways including direct communication, email, phone calls, text messages, alarms, announcements of public address

systems, or other methods.

Information about the exact location, presence, and nature of the incident will be communicated as information is obtained through the various communication channels listed above. Understand that unannounced imminent threats may have no warning and information may be highly limited.

Any employee that needs immediate assistance may contact law enforcement by calling 911. Employees that do not require immediate assistance may contact their manager or supervisor, or directly contact the IIPP administrator.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by a competent observer in the following areas of our workplace:

Competent Observer	Area
Summer Heraz	District Office
Denise Cuevas	Maintenance and Operations
Gina Hendrix	District Office
Yissel Silva	Transportation
Jessica Dinn, Principal	Ben Hulse Elementary School
Craig Casey, Principal	T.L. Waggoner Elementary School
Javier Ramos, Principal	Imperial Cross Elementary School
Blanca Iniguez, Principal	Frank Wright Middle School
Jose Apodaca, Principal	Imperial High School
Cynthia Herrera, Principal	Imperial Avenue Holbrook High School

Periodic inspections are performed at least once per month, according to the following schedule:

1. When we initially establish our IIPP and WVPP.
2. When new substances, processes, procedures, or equipment that present potential new hazards are introduced into our workplace.
3. Following any incident of workplace violence.
4. When new, previously unidentified hazards are recognized.
5. When occupational injuries and illnesses occur.
6. When an employee reports a concern regarding a workplace practice or condition that could become hazardous or dangerous.

7. Whenever workplace conditions warrant an inspection.

ACCIDENT, INCIDENT AND EXPOSURE INVESTIGATIONS

Procedures for investigating workplace accidents, incidents of workplace violence and hazardous substance exposures include:

1. Visiting the scene as soon as possible.
2. Interviewing injured workers, witnesses and other involved parties.
3. Examining the workplace for factors associated with accident, incident or exposure.
4. For incidents of workplace violence, review any previous reports of inappropriate behavior by the perpetrator.
5. Determining the cause of the accident, incident or exposure.
6. Taking corrective action to prevent future reoccurrences.
7. Recording the findings and corrective actions taken.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

1. When an imminent hazard exists that cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection.
2. All corrective actions taken will be documented and dated on the appropriate forms.

TRAINING AND INSTRUCTION

All workers, including managers and supervisors, shall have training and instruction on general and job-specific safety, health and workplace violence practices. Training and instruction will be provided as follows:

1. When the IIPP and WVPP were first established.
2. Annual WVPP training.
3. To all new workers.

4. To all workers given new job assignments for which job-specific training has not previously been provided.
5. Whenever new substances, processes, procedures, or equipment are introduced to the workplace and present a new hazard.
6. Whenever we are made aware of a new or previously unrecognized hazard.
7. Additional WVPP training will be provided following the identification of a new or previously unrecognized workplace violence hazard and when the WVPP is changed. The additional training will be limited to cover the newly identified hazard or the change to the WVPP.
8. To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed.
9. To all workers with respect to hazards specific to each employee's job assignment.

General workplace safety and health practices include, but are not limited to, the following:

1. Implementation and maintenance of the IIPP.
2. Emergency action and fire prevention plan.
3. Provisions for medical services and first aid, including emergency procedures.
4. Prevention of musculoskeletal disorders, including proper lifting techniques.
5. Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills.
6. Prohibiting horseplay, scuffling, or other acts that tend to adversely influence safety.
7. Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels.
8. Proper reporting of hazards and accidents to supervisors.
9. Hazard communication, including worker awareness of potential chemical hazards, and proper labeling of containers.
10. Proper storage and handling of toxic and hazardous substances, including prohibiting eating or storing food and beverages in areas where they can become contaminated.

Additionally, the District will provide employees training and instruction related to the WVPP including:

1. How to obtain a copy of the plan.
2. How to report workplace violence incidents.

3. Specific instructions regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.
4. How incidents of workplace violence are investigated and corrected.

EMPLOYEE ACCESS TO THE IIPP AND WVPP

A copy of the IIPP will be available to all employees or their authorized representatives via one of the following methods:

1. Provide access in a reasonable time, place, and manner, but in no event later than five (5) business days after the request for access is received from an employee or designated representative.
 - a. Whenever an employee or designated representative requests a copy of the Program, we will provide the requester a printed copy of the Program, unless the employee or designated representative agrees to receive an electronic copy of the Program.
 - b. One printed copy of the Program will be provided free of charge. If the employee or designated representative requests additional copies of the Program within one (1) year of the previous request and the Program has not been updated with new information since the prior copy was provided, we may charge reasonable, non-discriminatory reproduction costs for the additional copies.
2. Provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the Program. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

The WVPP will be available and easily accessible to all employees, their authorized representatives, and representatives from Cal/OSHA. This will be accomplished by:

1. Providing a printed copy, unless the employee or designated representative agrees to receive an electronic copy.
2. Providing unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the IPP. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

Where we have distinctly different and separate operations with distinctly separate and different IIPPs, we may limit access to the IIPP applicable to the employee requesting it.

An employee must provide written authorization in order to make someone their “designated representative.” A recognized or certified collective bargaining agent will be treated automatically as a designated representative for the purpose of access to the IIPP. The written authorization must include the following information:

- The name and signature of the employee authorizing the designated representative.
- The date of the request.

- The name of the designated representative.
- The date upon which the written authorization will expire (if less than 1 year).

IIPP RECORDKEEPING

We are a local governmental entity (any county, city, or district, and any public or quasi-public corporation or public agency therein) and we are not required to keep written records of the steps taken to implement and maintain our IIPP.

WVPP VIOLENT INCIDENT LOG

The District will maintain a violent incident log to record every instance of workplace violence. The log will record the following information:

1. The date, time and location of the incident.
2. A detailed description of the incident, including the Type category.
3. Perpetrator classification.
4. Circumstances and environment in which the incident occurred.
5. Incident outcome.
6. Employer response to the incident.

The violent incident log will not contain any personal identifying information of anyone involved in the incident, including name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, could reveal an individual's identity.

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.

WVPP RECORDKEEPING

The District will maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.

Training records will be maintained for a minimum of one (1) year and include the following:

- Training dates.
- Contents or a summary of the training sessions.
- Names and qualifications of persons conducting the training.

- Names and job titles of all persons attending the training sessions.

Violent incident logs and any incident investigations will be maintained for minimum of five (5) years.

- The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.

All WVPP records shall be made available to Cal/OSHA upon request for examination and copying in accordance with Labor Code section 6401.9.

Upon request and without cost, employees may access the following records for examination and copying within fifteen (15) calendar days:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

HAZARD ASSESSMENT AND CORRECTION RECORD

Date of Inspection: [Enter date]

Person Conducting Inspection: [Enter name]

Unsafe Condition or Work Practice: [Provide details, including root causes]

Corrective Action Taken: [Provide details, including solutions to root causes]

Date of Inspection: [Enter date]

Person Conducting Inspection: [Enter name]

Unsafe Condition or Work Practice: [Provide details, including root causes]

Corrective Action Taken: [Provide details, including solutions to root causes]

Date of Inspection: [Enter date]

Person Conducting Inspection: [Enter name]

Unsafe Condition or Work Practice: [Provide details, including root causes]

Corrective Action Taken: [Provide details, including solutions to root causes]

ACCIDENT/EXPOSURE INVESTIGATION REPORT

Date & Time of Accident: [Enter information]

Location: [Provide details]

Accident Description: [Enter details, including all events that lead up to the incident]

Workers Involved: [Enter information]

The underlying cause(s) of the accident/exposure: [Detail all root causes]

Corrective Actions Taken: [Provide details, including potential solutions to the root causes]

Manager Responsible: [Enter name]

Date Completed: [Enter date]

WORKER TRAINING AND INSTRUCTION RECORD

EMPLOYEE NAME	TRAINING DATES	TYPE OF TRAINING	TRAINERS

[illegible]

On-site Assistance Program Area Offices

Northern California

1750 Howe Avenue, Suite 490
Sacramento, CA 95825
(916) 263-0704

San Francisco Bay Area

1515 Clay Street,
Suite 1103
Oakland, CA 94612
(510) 622-2891

San Fernando Valley
6150 Van Nuys Blvd.,
Suite 307 Van Nuys,
CA 91401
(818) 901-5754

LA/Orange County

1 Centerpointe Dr.,
Suite 150

Central Valley

2550 Mariposa Mall,
Room 2005
Fresno, CA 93721
(559) 445-6800

San Bernardino

464 West 4th Street,
Suite 339 San
Bernardino, CA
92401
(909) 383-4567

La Palma, CA 90623
(714) 562-5525
San Diego/ Imperial
7575 Metropolitan
Dr., Suite 204 San
Diego, CA 92108
(619) 767-2060

Voluntary Protection Program Oakland, CA 94612 (510) 622-1081