



Franklin-McKinley School District

PREPARING ALL CHILDREN AS GLOBAL LEARNERS

Workplace Violence Prevention Plan

Date Published: June 12, 2024

Date of Last Revision(s): August 18, 2025

Franklin-McKinley School District'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.

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.

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, 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 used to effectively reduce workplace violence hazards.

RESPONSIBILITY

The WVPP administrator, Dario Lomeli, Custodial Supervisor/Safety Coordinator, has the authority and responsibility for implementing the provisions of this plan for Franklin-McKinley School District (“FMSD”/”District”). Other key members with areas of responsibility under the WVPP are listed below.

Responsible Persons	Job Title/ Position	WVPP Responsibility(ies)	Phone #	Email
Dario Lomeli	Building Maintenance Supervisor/ Safety Coordinator	Dario organizes safety meetings and approves the final plan and any significant changes. He will also review incident investigations and conduct safety inspections.	408-283-6037	dario.lomeli@fmsd.org
Dr. George Kleidon	Asst. Supt., Human Resources	George will maintain the Violence Incident Log (CalOSHA Form 300), be the point of contact for CALOSHA, and assist in reviewing Type 3 incident investigations.	408-283-6014	george.kleidon@fmsd.org
TBD	Director of Maintenance & Auxiliary Services	TBA updates training materials and communicates with other employers about the plan. She will also coordinate emergency response procedures.	408-283-6088	@fmsd.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.

EMPLOYEE ACTIVE INVOLVEMENT

Involving employees in the development and implementation of our WVPP is a critical component of the plan's overall effectiveness. We welcome and encourage employees to participate in both the initial development and implementation as well as the ongoing/annual refresher of this plan. The District has utilized, and will utilize, the following procedures to involve employees in the development and implementation of this plan:

- Many components of this plan came out of meetings and surveys that were available for all employees to participate in. Some of the feedback gathered included potential workplace violence hazards, implementation ideas, and current concerns surrounding workplace violence.
- The District conducts monthly safety meetings focused on establishing and maintaining a safe work environment for all employees. This information will be shared with employees and their representatives to discuss the identification of workplace violence-related concerns/hazards, evaluate those hazards and/or concerns, and determine how to correct them at each school site and department within the school district.
- Site and District managers will provide an opportunity to discuss workplace violence during staff meetings, and all employees are encouraged to participate in the dialogue.
- Additional ideas regarding training implementation, the contents of the plan, and/or concerns surrounding workplace violence can be sent to the WVPP Administrator listed above via telephone or email.

EMPLOYEE COMPLIANCE

While the WVPP Administrator 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 and managers will use the following procedures to ensure employees comply with the WVPP:

- Ensuring all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
- Ensuring employees take/attend the training(s) and refresher training(s) assigned to them.
- Monitor employee adherence to topics and concepts covered in the training they received.
- Provide retraining to employees who do not meet the safety standards outlined in the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace by giving out monthly safety awards.
- Follow our established disciplinary action process (per the applicable Collective Bargaining Agreements) if an employee or supervisor does not follow the elements of this plan.

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 includes workplace violence prevention policies and procedures.
- 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.
 - Ensure that supervisors and employees can communicate effectively and in the employees' first language.
- Posted or distributed workplace violence prevention information.
- Employees can anonymously report a violent incident, threat, or other violence concerns by completing the Workplace Violence Incident Report.
- Employees can contact 9-1-1 using a landline, a personal device, or a VOIP phone.
- 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 in a timely manner, and they will be informed of the results of the investigation and any corrective actions to be taken.
 - WVPP Workplace Violence Incident Reports shall be reviewed as soon as possible.
 - A response will be given as soon as practicable based on the nature of the report.
 - Employees will receive email updates on the status of investigations and corrective actions. These

updates could include information about the progress of investigations, their results, and any corrective actions taken.

- Periodic updates during 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 necessary training materials and incident reports with district partners to ensure a coordinated response to any incidents.

COORDINATION WITH CONTRACTED SERVICE PROVIDERS

The District will implement the following effective procedures to coordinate the implementation of its plan with District Contracted Service Providers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- Ensure the employer has trained their employees on workplace violence prevention.
- At sites that use Contracted Services, the District will ensure that if contracted service employees experience workplace violence, FMSD records the information and investigates.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

The District will implement the following effective procedures to ensure that:

- Employees should report workplace violence to their direct supervisor or manager (who will promptly notify the WVPP administrator) or call 9-1-1 if the threat/act of violence is imminent and serious.
- The **Workplace Violence Incident Report (WVIR)** can be found on the district website, posters with QR codes that will directly link to the WVIF, and this link [<https://shorturl.at/ilm0q>].
- All employees are encouraged to report any concerns or incidents related to workplace violence, and they can do so without fear of reprisal.

EMERGENCY RESPONSE PROCEDURES

Franklin-McKinley School District 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 alarms, visual alarms, or both. School site and district radios will be used to communicate and alert employees of emergency situations.
 - The District has emergency evacuation plans posted at each school site.
 - If there is immediate danger, call for emergency assistance by dialing (9) 9-1-1 and then notify the WVPP Administrator. The Local Police Department can be reached at 408-277-8911.

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

Responsible Persons	Job Title/Position	Phone #	Email
Dario Lomeli	Custodian Supervisor/Safety Coordinator	408-283-6073	dario.lomeli@fmsd.org

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by Franklin-McKinley School District to ensure that workplace violence hazards are identified and evaluated:

- Site 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.
- All submitted/reported concerns of potential hazards will be reviewed as received.
- 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 annually and as needed using the **Workplace Violence Hazard Assessment (WVHA) form**.
 - The Workplace Violence Hazard Assessment form can be accessed on the district website, via the posters published at each school site, or via this link [<https://shorturl.at/rZMOR>].

Specific Person Name/ Job Title	Area/Department/Specific Location
Site Administrator of each School/Department	The entire Campus or Department they oversee

Inspections for workplace violence hazards include assessing:

- Exterior and interior lighting
- School Site perimeter/accessibility
- The exterior and interior of the workplace for its attractiveness to intruders.

- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including our policy prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area to 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.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or summon assistance, e.g., alarms or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- 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.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected promptly. Franklin-McKinley School District will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation.
- All corrective actions taken will be documented and dated on the appropriate forms.
 - A Violent Incident Form should be completed right away.
 - Work orders will be placed and handled by our MOT Department.

- Corrective measures for workplace violence hazards will be specific to a given work area and based on the identified hazard.

PROCEDURES FOR POST-INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or their designee will utilize and complete the Post Incident Investigation, which is integrated into the [Workplace Violence Incident Report](#).

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 & witnesses, visit the location, document evidence, and ask follow-up questions).
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 the 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 [Workplace Violence Incident Report](#) for recordkeeping and reporting purposes:
 - 8.1. The date, time, and location of the incident.
 - 8.2. The workplace violence type or types involved in the incident.
 - 8.3. Detailed description of the incident.
 - 8.4. A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
 - 8.5. A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
 - 8.6. A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
 - 8.7. A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - 8.8. The type of incident, including, but not limited to, whether it involved any of the following:
 - 8.8.1. Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - 8.8.2. Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.

- 8.8.3. Threat of physical force or threat of the use of a weapon or other object.
- 8.8.4. Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- 8.8.5. Animal attack.
- 8.8.6. Other.
- 8.9. Consequences of the incident, including, but not limited to:
 - 8.9.1. Whether security or law enforcement was contacted and their response.
 - 8.9.2. Actions taken to protect employees from a continuing threat or any other hazards identified as a result of the incident.
 - 8.9.3. Information about the person completing the log, including their name, job title, and completion date.
- 9. Review all previous incidents.
- 10. Provide support and resources to affected employees:
 - 10.1. Referrals to counseling services
 - 10.2. Information about employee assistance programs
 - 10.3. Time off work if necessary

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:

1. Our WVPP plan, how to obtain a copy of the plan at no cost, and how to participate in the development and implementation of the plan.
2. The definitions and requirements of SB 553.
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. The required violent incident 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. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

The District ensures that the WVPP plan shall be in writing and available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by:

- Uploading the Workplace Violence Prevention Plan to the District website
- Providing a hard copy available at all school sites
- Providing an electronic or printed copy whenever an employee or designated representative requests one

RECORDKEEPING & ACCESS TO RECORDS

Franklin-McKinley School District will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction for at least five (5) years.
- Create and maintain training records 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.
- Maintain violent incident logs for a minimum of five (5) years.
- Maintain records of workplace violence incident investigations for at least five (5) years.
 - The records shall not contain medical information per subdivision (i) of section 56.05 of the Civil Code.
- Provide Cal/OSHA with all records of workplace violence hazard identification, evaluation, correction, training, incident logs, and workplace violence incident investigations required by Labor Code section 6401.9(f) upon request for examination and copying.

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within ten (10) calendar days of a request:

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

The WVPP Administrator will be responsible for ensuring that all relevant records are completed, maintained, and made available upon request as required by this plan and/or Cal/OSHA. A safe and healthy workplace is the goal of everyone at FMSD, with responsibility shared by management and staff alike.

REVIEW AND REVISION OF THE WVPP

The Franklin-McKinley School District WVPP will be reviewed for effectiveness:

- 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:

- A review of Franklin-McKinley School District's 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.

EMPLOYER REPORTING RESPONSIBILITIES

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, Franklin-McKinley School District 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, Dario Lomeli, Custodial Supervisor/Safety Coordinator of Franklin-McKinley School District, 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.

Dario Lomeli

Date

Resources:

- [Workplace Violence Prevention Plan](#)
Alternate Link:
<https://docs.google.com/document/d/1vLkCO9qCvsCTJTXAAUItwcJyMPY0hu2M/edit?pli=1>
- [Workplace Violence Incident Report](#)
Alternate link: <https://shorturl.at/ilm0q>
- [Workplace Violence Hazard Assessment](#)
Alternate Link:
<https://shorturl.at/rZMOR>
- [WVPP Presentation](#)
Alternative Link:
<https://docs.google.com/presentation/u/0/d/1rcrSHQ2irFS4GqdGW3-1ZZZfw7XcmAub/edit?fromCopy=true&ct=2>
- Video Training - Coming Soon!