



Cambria Community Services District

Workplace Violence Prevention Plan (“WVPP”) Policy 3525

Effective July 1, 2024

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I. Purpose

The purpose of the Cambria Community Services District's ("District") Workplace Violence Prevention Plan ("Plan" or "WVPP") is to establish, implement, and maintain an effective workplace violence prevention plan as required under Labor Code sections 6401.7 and 6401.9.

Specifically, this Plan contains procedures to address the following statutory requirements:

- 1) Record information in a Violent Incident Log for every incident of Workplace Violence, as defined below.
- 2) Provide effective training to employees on the legal requirements related to the prevention of workplace violence, including but not limited to the District's WVPP.
- 3) Maintain records of the following: (a) Workplace Violence hazards, (b) District employee (hereinafter referred to as "employees") trainings, (c) Violent Incident Logs, and (d) the investigation of any incident of Workplace Violence.
- 4) Ensure certain records are made available to the Division of Occupational Safety and Health ("Division" or "DOSH"), employees, and any authorized employee representatives.

II. Scope of Coverage

a. Workplaces

The WVPP applies to all District workplaces unless a workplace is expressly exempt from coverage.

The following workplaces are exempt from and not subject to the WVPP:

- 1) A workplace from which an employee has chosen to telework that is not under the control of the District.
- 2) A workplace where fewer than ten (10) employees work at any given time and that is not accessible to the public, if such workplace complies with the regulatory requirements related to the Illness & Injury Prevention Plan (IIPP).

b. Employees

The WVPP applies to all District employees, unless an employee is expressly exempted.

The following employees are exempt from coverage under the WVPP:

- 1) An employee who is teleworking from a location of the employee's choice, which is not under the control of the District.
- 2) An employee who is working at a workplace where fewer than ten (10) employees work at any given time and that is not accessible to the public, if such workplace complies with the regulatory requirements related to the IIPP.

c. Employer-Provided Housing

The WVPP applies to all firefighters in District-provided housing.

III. Effective Date

The effective date of this Plan is July 1, 2024.

The Plan shall continue in full force and effect until repealed or rescinded.

IV. Definitions

For the purposes of the WVPP, the following definitions apply:

- “Access” means the right and opportunity to examine and receive a copy of the WVPP.
- “Designated Representative” means any individual or organization to whom an employee gives Written Authorization to exercise a right of Access. A recognized or certified collective bargaining agent shall be considered a Designated Representative for the purpose of Access to the WVPP.
- “Emergency” or “Emergencies” means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
- “Engineering Controls” mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.
- “Serious Injury or Illness” means 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” means 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” means any act of violence or Threat of Violence that occurs in the District’s covered workplace. Workplace Violence does not include lawful acts of self-defense or defense of others.
- Workplace Violence includes but is not limited to the following:
 - 1) 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.
 - 2) 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.
 - 3) The following four (4) types of Workplace Violence:

- “Type 1 violence” means Workplace Violence committed by a person who has no legitimate business at the workplace and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
 - “Type 2 violence” means Workplace Violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 - “Type 3 violence” means Workplace Violence against an employee by a present or former employee, supervisor, or manager.
 - “Type 4 violence” means 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 Prevention Committee (“Committee”) means the group of Management & Confidential employees (MCE) who assess District’s Workplace Violence hazards and support in the implementation of the WVPP.
 - Workplace Violence Prevention Coordinator (“Coordinator”) means the individual who is responsible for implementing the WVPP. The Coordinator is the General Manager or their designee.
 - “Work Practice Controls” means procedures and rules, which are used to effectively reduce Workplace Violence hazards.
 - “Written Authorization” means a request provided to the District containing the following information:
 - 1) The name and signature of the employee authorizing a representative of the employee to access the WVPP on the employee’s behalf;
 - 2) The date of the request;
 - 3) The name of the designated representative (individual or organization) authorized to receive the WVPP on the employee’s behalf; and
 - 4) The date upon which the Written Authorization will expire, if less than one (1) year.
 - “WVPP” or “Plan” means the Workplace Violence Prevention Plan.
 - “Violent Incident Log” or “Log” means the violent incident log required by this WVPP.

V. The Plan

a. Access

The District makes the WVPP available and accessible to employees, Designated Representatives, and representatives of the DOSH at all times.

1) Employees

The District will provide Access to the WVPP to employees as follows:

- 1) The District has made and will continue to make the WVPP available and will provide access to employees by providing an employee with a physical copy of the WVPP within five (5) business days of receiving the request for Access from the employee.

Whenever an employee requests a copy of the WVPP, the District shall provide the requesting employee with a printed copy unless the employee agrees to receive an electronic copy.

The District will provide one (1) printed copy of the WVPP free of charge. If an employee requests additional copies of the WVPP within one (1) year of the previous request and the WVPP has not been updated with new information since the prior copy was provided, the District may charge reasonable, non-discriminatory reproduction costs for the additional copies.

- 2) An employee can Access the WVPP through the District’s website (<https://www.cambriacsd.org/workplace-violence-prevention-plan>), where the employee can review, print, and email the current version of the WVPP.

2) Designated Representatives

The District will make the WVPP available and provide Access to Designated Representatives in a manner consistent with Section V(a)(1) of the District’s WVPP only after the employee provides Written Authorization to the District unless otherwise stated.

The District makes the WVPP available and provides Access to any employee organization that represents employees in a manner consistent with WVPP Section V(a)(1) without requiring that an employee provide prior Written Authorization to the District.

3) DOSH Representatives

The District will make the WVPP available to DOSH representatives upon request.

b. Implementation

1) Workplace Violence Prevention Coordinator (“Coordinator”)

The individual identified below shall serve as the District’s Workplace Violence Prevention Coordinator (“Coordinator(s) and is authorized to and responsible for implementing the WVPP:

(“Title”)	Job Title/Position	Contact Information	WVPP Responsibilities
General Manager	General Manager	(805) 503-0466 or (805) 927-6230	Workplace Violence Prevention Coordinator

Specifically, the General Manager will be responsible for the following:

- 1) Serve as the Chair of the District’s Workplace Violence Prevention Committee (“Committee”).
- 2) Establish and coordinate Work Practice Controls.
- 3) Establish and coordinate Engineering Controls.

- 4) Respond to reports of Workplace Violence incidents and Workplace Violence hazards, including investigating incidents of Workplace Violence and Workplace Violence hazards.

2) Workplace Violence Prevention Committee (“Committee”)

The District established a Workplace Violence Prevention Committee (“Committee”) to assess the District’s Workplace Violence hazards and determine preventative actions to be taken.

The Committee shall be comprised of the General Manager and Management & Confidential Employees (MCE) and the following individuals:

- General Manager
- Administrative Department Manager
- Confidential Administrative Assistant
- Fire Chief
- Facilities & Resources Manager
- Utilities Department Manager
- Water Systems Superintendent
- Wastewater Systems Superintendent
- Program Manager
- Employee Representative from SEIU Bargaining Unit
- Employee Representative from IAFF Bargaining Unit

The Committee shall undertake the following:

- 1) Meet regularly, but not less than quarterly;
- 2) Prepare and make available to any affected employees, the records of the workplace violence issues discussed at the Committee meetings and maintained for review by DOSH upon request;
- 3) Review the results of the District’s periodic, scheduled workplace inspections;
- 4) Review investigations of Workplace Violence and their causes, and where appropriate, submit suggestions to the District’s management for the prevention of future incidents. Personal identifying information, including employee names shall be excluded from documents provided to the Committee;
- 5) Review investigations of alleged Workplace Violence hazards brought to the attention of any Committee member. When determined necessary by the Committee, the Committee may conduct its own inspection and investigation to assist in remedial solution(s). Personal identifiable information shall be excluded from investigation reports prepared or provided to the Committee;
- 6) Submit recommendations to assist in the evaluation of employee safety suggestions;
- 7) Upon request from the DOSH, verify abatement action taken by the District to abate citations issued by the DOSH;
- 8) Provide updates to the WVPP;
- 9) Prepare and implement Workplace Violence training subsequent to the initial training; and

10) At minimum, review the WVPP under the following circumstances: (a) once annually; (b) when a deficiency is observed or becomes apparent; and (c) after a Workplace Violence incident.

a) A review of the WVPP should include the following: (a) review of the Violent Incident Log; (b) review employee comments and feedback on the WVPP; (c) review of other records; and (d) a physical inspection of the workplace.

b) Following the review, report any revisions to the Plan to employees.

c. *Obtaining Active Employee Involvement in Developing and Implementing the Plan*

The District encourages the active involvement of employees in developing and implementing the WVPP through and by the measures discussed in the sections below.

1) Identifying, Evaluating, and Correcting Workplace Violence Hazards

The District encourages the active involvement of employees in identifying, evaluating, and correcting Workplace Violence hazards through and by the following means:

- 1) Regular meetings of the Committee comprised of both the District and employees that is charged with identifying, evaluating, and correcting Workplace Violence hazards;
- 2) Schedule general employee meetings at which Workplace Violence hazards are freely and openly discussed by those present. Such meetings shall be regular, scheduled, and announced to all employees so maximum employee attendance can be achieved;
- 3) Survey employees regarding the identification, evaluation, and correction of any Workplace Violence hazards;
- 4) Provide a means by which employees may provide anonymous feedback regarding the identification, evaluation, and correction of any Workplace Violence hazards; and
- 5) Provide a means by which employees may report potential Workplace Violence hazards that the District will evaluate and, if necessary, correct.

2) Designing and Implementing Training

The District encourages the active involvement of employees in designing and implementing training through and by the following means:

- 1) Regular meetings of the Committee comprised of both the District and employee representatives that is charged with designing and implementing training;
- 2) Provide opportunities for employees to identify the daily activities they believe put them at most risk for Workplace Violence and address those activities within the training;
- 3) Authorize sufficient time and resources to facilitate employee participation, including holding trainings during regular working hours; and

- 4) Establish surveys to evaluate the effectiveness of the training and authorize sufficient time and resources following each training to ensure employees can complete the evaluation. The District shall adapt the training based on the results of these evaluations.

3) Reporting and Investigating Workplace Violence Incidents

The District encourages the active involvement of employees in reporting and investigating Workplace Violence incidents through and by the following means:

- 1) Regular meetings of the Committee comprised of both the District and employee representatives that is charged with reviewing investigations of Workplace Violence incidents and hazards;
- 2) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern in which there is an immediate threat to the employee's safety or the safety of others or where a Serious Injury or Illness has occurred to immediately report the incident to law enforcement, security, and/or emergency medical services;
- 3) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern to immediately report the facts and circumstances of the violent incident, threat, or other Workplace Violence concern to their supervisor or the General Manager.
- 4) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern to participate in the investigation of the violent incident, threat, or other Workplace Violence concern;
- 5) Implement procedures to ensure that employees are not retaliated against for reporting or participating in investigations of Workplace Violence incidents;
- 6) Allocate adequate resources and training for employees to appropriately recognize Workplace Violence concerns;
- 7) Provide coverage, if necessary, so employees can immediately report a concern of Workplace Violence during their regularly scheduled work hours and participate in investigations; and
- 8) Recognize and reward employees who report violent incidents, threat, or other Workplace Violence concerns.

d. Coordination with Other Employers

If and when applicable (*e.g.*, for multi-employer workplaces), the District shall coordinate the implementation of the Plan with other employers in order to ensure that those employers and employees understand their respective roles, as provided in the Plan.

Specifically, the District will coordinate with other employers to ensure that all employees receive workplace Violence prevention training and that all Workplace Violence incidents involving any employee are reported, investigated, and recorded.

At a multiemployer worksite, the District will ensure that when an employee experiences a Workplace Violence incident, the District shall record the information in the Violent Incident Log and provide a copy of that Log to the controlling employer. If the District is the controlling employer at a worksite, the District will ensure that it receives copies of all Logs from other employers.

e. Compliance

The District will ensure compliance with the Plan through and by the measures discussed in this section.

1) Expectations of Employees Regarding Compliance with the Plan

A. Employees

All employees should be familiar with the WVPP and its requirements.

All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting the District maintain a safe and secure work environment.

All employees are required to know, understand, and adhere to the safety rules that apply to their workplace and the work they perform.

B. Managers and Supervisors

Managers and supervisors are responsible for implementing and maintaining the WVPP in their respective work areas and for ensuring that all employees adhere to the safety rules that apply in these work areas.

Managers and supervisors should answer questions that employees may have about the Plan and its requirements, be able to direct employees to the General Manager or provide resources for employees to use that will answer their questions.

2) Methods to Ensure Compliance

A. Training and Retraining of Employees on Plan Requirements

The District shall ensure substantial compliance with the WVPP by providing employees with training as discussed in the Plan.

B. Enforcement of the Plan Requirements and Discipline for Non-Compliance

Managers and supervisors will enforce the rules and requirements related to the Plan fairly and uniformly.

Employees who do not comply with the safety rules and requirements set forth in the Plan may be subject to discipline, up to and including termination.

Managers and supervisors who do not enforce the rules and requirements related to the Plan or do not enforce them fairly and uniformly may be subject to discipline, up to and including termination.

f. Communicating to Employees about Workplace Violence

The District will communicate to employees about reporting and investigating Workplace Violence incidents.

The District's procedures for communicating to employees regarding Workplace Violence incidents include the following:

- 1) Reporting on violent incidents, threats, or other violent Workplace Violence concerns;

- 2) Informing affected employees of the general results of any investigation into Workplace Violence incidents, while protecting the privacy of affected and/or involved employees;
- 3) Informing affected employees of the corrective actions taken in response to the Workplace Violence incident, while protecting the privacy of affected and/or involved employees; and
- 4) Communicating to employees about the prohibition on retaliating against employees who participate in the investigation of Workplace Violence incidents.

1) Reporting Violent Incidents

An employee may report a Workplace Violence incident through any of the following means:

- 1) Reporting the incident to any manager or supervisor verbally or in writing.
- 2) Reporting the incident to the General Manager or other Committee member.
- 3) Reporting the incident to a Designated Representative, who will facilitate a report to the District. The District will respond to the report after it receives the report from the Designated Representative.

Reporting by completing and submitting a physical or electronic Violent Incident Report Form to the General Manager. The Violent Incident Report Form is attached to the Plan as Exhibit A.

2) Acceptance of and Response to Reports of Workplace Violence

The District shall accept and respond to all reports of Workplace Violence.

A. Immediate Response

Immediately following a report of Workplace Violence, the District shall immediately respond by providing first aid and emergency care to the injured employee(s) and by taking any measures necessary to prevent other employees from being injured.

The District will ensure that any injured employees receive prompt medical evaluation and treatment and that injured employees are provided transportation to receive medical care if such care is not provided on-site.

The District will immediately report to DOSH any Serious Injury, Illness, or death of an employee that is attributable to Workplace Violence.

B. Investigating the Report of Workplace Violence

The District shall investigate reports of Workplace Violence as provided in the following section.

C. No Retaliation

The District shall not take adverse action against any employee who reports Workplace Violence or who participates in any investigation of Workplace Violence based on such conduct.

D. Provision of Leave for Employees Who are or May be Victims of Violence

The District shall not take adverse action against any employee who takes time off from work in order to seek a Temporary Restraining Order (“TRO”) or to obtain other assistance to help safeguard the “health, safety, or welfare” of the employee or their child based on such conduct. An employee may use paid sick leave pursuant to the District Personnel Policies, Procedures & Rules to take time off from work for these purposes.

An employee shall provide the District reasonable and advance notice of their intention to take time off from work for either of these purposes if feasible. If advance notice is not feasible, employees must provide a certification to the employer within a reasonable time after the absence.

E. Temporary Restraining Orders

When an employee has suffered unlawful violence or a credible Threat of Violence from any individual, which may reasonably be carried out at any of the District’s workplaces, the District may attempt to obtain a TRO on behalf of the employee.

3) Investigation of Workplace Violence

The District shall respond to reports of Workplace Violence or a Threat of Violence by promptly initiating an investigation, as applicable.

The District’s investigation of Workplace Violence or a Threat of Violence may include, but not necessarily be limited to, the following steps or measures, as applicable:

- 1) Visiting the scene of an incident as soon as safe and practicable;
- 2) Collection of facts on who, what, when, where, and how the incident occurred;
- 3) Collection of statements from involved parties, such as employees, witnesses, law enforcement, and/or security personnel;
- 4) Reviewing security footage of existing security cameras if applicable;
- 5) Collection of photographic or video evidence of damage or injuries, where appropriate;
- 6) Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator;
- 7) Consultation with the affected employees, witnesses, and Committee members to identify potential contributing causes;
- 8) Obtaining any reports completed by law enforcement;
- 9) Assessment of any Threat of Violence, identifying the following, as applicable and to the extent the information is known by the District:
 - a) The exact nature and context of the threat and/or threatening behavior;
 - b) The identified target;
 - c) The person’s apparent motivation;

- d) The person's ability to carry out the threat; and
- e) The person's background, including work history, criminal record, mental health history, and past behavior on the job.

Following an investigation, the District may take the following measures, as applicable:

- 1) Notify the affected employees of the general results of the investigation while protecting the privacy of affected and/or involved employees;
- 2) Collaborate with the Committee to recommend corrective action;
- 3) Implement changes in Engineering Controls, procedures, or policies, if appropriate; and/or
- 4) Establish updated Work Practice Controls, if necessary.

The District shall retain records of Workplace Violence incident investigations for a minimum of five (5) years.

4) Documentation in Violent Incident Log

All Workplace Violence incidents shall be subsequently reported in the Violent Incident Log. Information that is recorded in the Log for each incident shall be based on information solicited from the employees who experienced Workplace Violence, on witness statements, and on investigation findings. The District shall omit from the Log any element of personal identifying information that would be sufficient to allow identification of any person involved in a Workplace Violence incident.

The information recorded in the Log shall include all of the following:

- 1) The date, time, and location of the incident;
- 2) The Workplace Violence type or types (*e.g.*, Type 1, Type 2, Type 3, or Type 4);
- 3) A detailed description of the incident;
- 4) A classification of who committed the Workplace Violence, including whether the perpetrator was:
 - a) A client or customer;
 - b) Family or friend of a client or customer;
 - c) Stranger with criminal intent;
 - d) Coworker;
 - e) Supervisor or manager;
 - f) Partner or spouse;
 - g) Parent or relative; or
 - h) Other perpetrator;

- 5) A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was:
 - a) Completing usual job duties;
 - b) Working in poorly lit areas;
 - c) Rushed;
 - d) Working during a low staffing level;
 - e) Isolated or alone;
 - f) Unable to get help or assistance;
 - g) Working in a community setting; or
 - h) Working in an unfamiliar or new location.
- 6) A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area;
- 7) The type of incident, including, but not limited to, whether it involved any of the following:
 - a) Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting;
 - b) Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object;
 - c) Threat of physical force or threat of the use of a weapon or other object;
 - d) Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact;
 - e) Animal attack; or
 - f) Other;
- 8) Consequences of the incident, including, but not limited to:
 - a) Whether security or law enforcement was contacted and their response;
 - b) Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident;
- 9) Information about the person completing the Log, including their name, job title, and the date completed.

5) Prohibition on Retaliation

The District has implemented the following measures to prevent and prohibit retaliation against those who report Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or who participate in the investigation of such incidents or hazards:

- 1) The District responds to reports of Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence in a prompt and timely manner;
- 2) The District provides employees multiple channels by which to report incidents, hazards, or concerns, including anonymously and through or by a Designated Representative;
- 3) The District admonishes managers and supervisors not to retaliate against any employee who reports Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or any employee who participates in the investigation of such incidents or hazards; and
- 4) The District trains all employees that retaliation against any employee who reports Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or any employee who participates in the investigation of such incidents or hazards is expressly prohibited and that there are consequences, such as discipline, for retaliation against such employees.

g. Identification, Evaluation, and Correction of Workplace Violence Hazards

The District shall undertake all necessary actions to identify, evaluate, and correct Workplace Violence hazards.

1) Identification of Workplace Violence Hazards

The District shall undertake all necessary actions to identify Workplace Violence hazards.

The District shall conduct inspections of its workplace(s) to identify Workplace Violence hazards.

Specifically, the District shall conduct inspections under the following circumstances:

- 1) When the WVPP is first established;
- 2) After each Workplace Violence incident;
- 3) Whenever the District is made aware of a new or previously unrecognized hazard; and
- 4) Annually.

Periodic inspections to identify and evaluate Workplace Violence and hazards will be performed by the following employees in the following areas of the workplace:

Job Title of Employee	Inspection Area/Department/Specific Location
Administrative Department Manager	Administration Office at 2150 Main Street, #1-A, Cambria, CA 93428.
Fire Chief	Cambria CSD Fire Department located at 2850 Burton Dr, Cambria, CA 93428.
Facilities & Resources Manager	Facilities & Resources Department, Cambria Veterans' Memorial Building, Parks, Recreation &

	Open Space areas, and Public Restrooms
Utilities Department Manager, Wastewater Systems Superintendent, and Water Systems Superintendent	Utilities, Wastewater and Water Departments at 5500 Heath Lane, Cambria, CA 93428

Inspections for Workplace Violence hazards may include assessing factors specific to the District’s workplace, such as the following:

- 1) The exterior and interior of the workplace for its attractiveness to robbers;
- 2) The need for violence surveillance measures, such as mirrors and cameras;
- 3) Procedures for employee response during a robbery or other criminal act, including the District’s policy prohibiting employees who are not security guards from confronting violent persons or persons committing a criminal act;
- 4) Procedures for reporting suspicious persons or activities;
- 5) Effective location and functioning of emergency buttons and alarms;
- 6) Posting of emergency telephone numbers for law enforcement, fire, and medical services;
- 7) Whether employees have access to a telephone with an outside line;
- 8) Whether employees have effective escape routes from the workplace;
- 9) Whether employees have a designated safe area where they can go to in an emergency;
- 10) Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems;
- 11) Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of the District our establishment;
- 12) Employees’ skill in safely handling threatening or hostile service recipients;
- 13) Effectiveness of systems and procedures that warn others of actual or potential Workplace Violence danger or that summon assistance, e.g., alarms or panic buttons;
- 14) The use of work practices such as the "buddy" system for specified emergency events;
- 15) The availability of employee escape routes;
- 16) How well the District’s establishment's management and employees communicate with each other;
- 17) 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;
- 18) Frequency and severity of employees’ reports of threats of physical or verbal abuse by managers, supervisors, or other employees; and
- 19) Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.

2) Investigation of Workplace Violence Hazards

The District will initiate an investigation following the identification of a Workplace Violence hazard in order to evaluate the nature of the hazard.

The District may undertake the following as part of such investigation, as applicable:

- 1) Collection of statements from witnesses;
- 2) Collection of photographic or video evidence of damage or injuries, where appropriate; and
- 3) Consultation with the affected employees, witnesses, and Committee members to identify potential contributing causes.

3) Correction of Workplace Violence Hazards

After the identification and investigation of a Workplace Violence hazard and after a Workplace Violence Hazard inspection, the District will take appropriate steps to correct the hazard and prevent or control future or potential hazards by implementing the following measures:

- 1) **Substitution:** When possible, the District will correct a hazard by eliminating or substituting it with a safer Work Practice Control (“Substitution”).
- 2) **Removal of Employees:** In the event that a Workplace Violence hazard exists that cannot be immediately corrected without endangering employees or property, the District will remove all employees from the work site except those necessary to correct the existing hazard. Employees who are necessary to correct the hazard will be provided with the necessary protection in order to protect them from the hazard.
- 3) **Replacement of Equipment:** If a piece of equipment is hazardous, the District will remove it from service and identify it as defective.
- 4) **Engineering Controls:** The District will apply physical changes to either remove the hazard from the workplace or create a barrier between employees and the hazard. Based on the nature of the hazard and the needs of the workplace, Engineering Control strategies may include the following: (a) using physical barriers (such as enclosures or guards) or door locks to reduce employee exposure to the hazard; (b) metal detectors; (c) panic buttons; (d) improved or additional lighting; and (e) more accessible exits (where appropriate).
- 5) **Work Practice Controls:** The District will adjust Work Practice Controls if Substitution or Engineering Controls are impossible or inappropriate. Additional Work Practice Controls may be necessary in addition to Substitution and Engineering Controls to prevent future Workplace Violence hazards. Work Practice Control strategies may include the following: (a) hiring security guards and having them patrol the workplace interior and perimeter; (b) ensuring employees have access to a telephone with an outside line; posting emergency telephone numbers in the workplace for law enforcement, fire, and medical services; (c) improved or altered communication measures; (d) improved or altered policies of prohibited practices (such as a weapons ban or limitation of the amount of cash on hand); and a “buddy system” for specified Emergency events; (d) adding security cameras or mirrors.
- 6) **Training:** The District will educate employees about the identified hazard in subsequent WVPP training.

- 7) **Collaborate with the Committee:** The District will collaborate with the Committee on other ways to correct the hazard.
- 8) **Notice to Affected Employees:** The District will notify affected employees in writing of the corrective measures the District implemented to address the Workplace Violence hazard.

4) Recording Information regarding Workplace Violence Incidents

The District will document the identification, investigation, and correction of Workplace Violence hazards and maintain such records for at least five (5) years following the identification, investigation, and correction of such hazards.

The District shall record information in the Violent Incident Log for each Workplace Violence incident.

The information recorded in the Log for each incident shall be based on information solicited from the employee(s) who experienced the Workplace Violence, witness statements, and investigation findings.

The Log is attached to the WVPP as Exhibit B.

The District will document all work-related injuries or illnesses caused by Workplace Violence that resulted in death, loss of consciousness, days away from work, restricted work activity or job transfer, or medical treatment beyond first aid to DOSH.

h. Responding to Workplace Violence Emergencies

The District will use an emergency alerting system to alert employees of the presence, location, and nature of Workplace Violence Emergencies.

Following a Workplace Violence Emergency, a notification through the alerting system will include information regarding the following:

- 1) The existence/presence of a Workplace Violence Emergency;
- 2) The location of a Workplace Violence Emergency;
- 3) The nature of the Workplace Violence Emergency; and
- 4) The appropriate response procedures for employees.

The District has developed evacuation and sheltering protocols for each District workplace attached to the WVPP as Exhibit C.

In a Workplace Violence Emergency, employees can obtain help from any manager or supervisor, General Manager, any Committee member, or, if applicable, from security or law enforcement. Employees should promptly call 911 in the event of a Workplace Violence Emergency.

i. Training

The District shall provide training when the Plan is first established and when new employees are hired.

The District shall ensure annual training thereafter.

The District shall provide training on all the following subjects:

- 1) The District's Plan, how to obtain a copy of the District's Plan at no cost, and how to participate in the development and implementation of the District's Plan;
- 2) Definitions and requirements of the Plan;
- 3) How to report Workplace Violence incidents or concerns to the District or law enforcement without fear of reprisal;
- 4) Workplace Violence hazards specific to the employees' jobs, the corrective measures the District has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm; and
- 5) The District's Violent Incident Log and how to obtain copies of records related to Workplace Violence.

The training shall include an opportunity for interactive questions and answers with a person knowledgeable about the District's Plan.

The District shall provide additional training when a new or previously unrecognized Workplace Violence hazard has been identified and when changes are made to the Plan.

VI. Recordkeeping

The District shall maintain the following types of records for the following periods:

Type of Record	Maintenance Period
Records of Workplace Violence hazard identification, evaluation, and correction	Minimum of five (5) years
Training records, including training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions	Minimum of one (1) year
Violent Incident Logs	Minimum of five (5) years
Records of Workplace Violence incident investigations. These records must not contain medical information.	Minimum of five (5) years

The District shall ensure that records of Workplace Violence Incident Investigations do not contain any medical information, including any information in electronic or physical form, in possession of or derived from a provider of health care, health care service plan, pharmaceutical company, or contractor regarding a patient's medical history, mental health application information, reproductive or sexual health application information, mental or physical condition, or treatment that includes or contains any element of personal identifying information sufficient to allow identification of the individual.

The District shall make all records required by this WVPP available to DOSH upon request for examination and copying purposes.

The District shall make the following records available to employees and their Designated Representatives, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request:

- 1) Records of Workplace Violence hazard identification, evaluation, and correction;
- 2) Training records; and
- 3) Violent Incident Logs.

Exhibit C

EVACUATION AND SHELTERING PROTOCOL

The below evacuation and sheltering protocols were developed using guidance from the Department of Homeland Security (“DHS”),¹ the Federal Bureau of Investigation (“FBI”),² and the California Governor’s Office of Emergency Services (“Cal OES”)³ for responding to workplace violence emergencies caused by an active shooter.

PLAN AHEAD

- An active shooter is a person actively engaged in killing or attempting to kill people in a place of employment. An active shooter situation is not the only cause for a workplace violence emergency.
- Violent attacks can involve any type of weapon, not just guns. Weapons may include, but are not limited to guns, knives, explosives, and blunt objects. Other forms of physical force can be as deadly as guns.
- These suggested actions are applicable in *any* encounter with a violent person and are not limited to active shooter situations.
- Workplace violence emergencies are unpredictable. They may happen quickly and circumstances may unfold rapidly.
- Employees must be prepared to deal mentally and physically with a workplace violence emergency in order to protect their lives before law enforcement arrives to secure the scene and subdue the assailant.
- Visualize possible escape routes, including the two (2) nearest physically accessible routes to you and your workplace. Take note of accessible routes for people with disabilities or limited mobility.
- Familiarize yourself with how to mute your phone and the electronics in your area as you may need to do this in a workplace violence emergency in order to hide from the assailant.
- Gunfire may sound artificial. During a workplace violence emergency, assume that any popping sound is gunfire.
- Call 911 when it is safe to do so. Do not assume that someone else has reported the incident. You may have information to provide that may be critical for law enforcement, such as the number or location of assailants or victims; number and types of weapons; and descriptions or identifications of the assailants.

IN A WORKPLACE VIOLENCE EMERGENCY

You should react quickly, to determine the most reasonable way to protect your own life, using the **RUN, HIDE, OR FIGHT** procedures.

RUN **Evacuate, If Possible**

¹ https://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf.

² <https://www.fbi.gov/how-we-can-help-you/active-shooter-safety-resources>.

³ <https://www.caloes.ca.gov/gunsafety/how-to-respond/#:~:text=FIGHT-,RUN,attempt%20to%20evacuate%20the%20premises>.

Exhibit C

If there is an accessible escape route, attempt to evacuate.

- Have a route and plan in mind.
- Leave personal and professional belongings behind.
- If possible, help others to escape, and prevent them from entering an area where the assailant might be located. Do not stay behind just because other individuals will not or cannot evacuate.
- Call 911 when it is safe to do so.
- Keep your hands visible to law enforcement.
- Follow any instructions issued by law enforcement.
- Evacuate to the location designated by your employer for your workplace.

HIDE

Hide as safely and silently as possible

If you cannot evacuate safely, find a place to hide (i.e., shelter).

- Choose a hiding place that is:
 - Out of the assailant's view.
 - An area with protection if shots are fired towards you, such as an office with a closed and locked door.
 - A place that does not trap you or restrict your options for movement.
- Lock doors, if possible.
- Blockade the door (or windows if the shooter is outside) with heavy furniture or secure it with belts or cords.
- Turn off lights.
- Turn off or silence phones and other electronics.
- Hide behind large items like cabinets or desks.
- Stay low to the ground to reduce your visibility and to present a smaller target.
- Dial 911 when it is safe to do so, to alert the police to your hiding place. If you cannot speak, leave the line open to allow the dispatcher to listen.
- Stay quiet.

FIGHT

As a last resort, take action to disrupt or incapacitate the assailant

- As a last resort, and only when your life is in imminent danger, fight within the best of your abilities.
- Attempt to incapacitate or disrupt the assailant.

Exhibit C

- Act as aggressively as possible towards the assailant.
- Throw or improvise weapons from objects in your area.
- Yell.
- Commit to your actions.
- Call 911 when it is safe to do so.

IMMEDIATELY AFTER THE INCIDENT

When you encounter law enforcement officers, display your empty hands, with open palms.

To end an incident, law enforcement officers may initially need to go past you or wounded people.

Rescue teams of officers and emergency medical personnel will provide care and assistance to injured people. They may ask able-bodied individuals for assistance in moving the wounded. Seek medical attention if you are injured or wounded.

You may be held in an area by law enforcement until it is safe and witnesses have been identified and questioned.

Do not leave until law enforcement authorities have instructed you to do so. Do not leave without informing a manager or supervisor so that you are accounted for.

Consider seeking assistance from a mental health provider.