

WORKPLACE VIOLENCE PREVENTION PLAN

Section 1: Policy Statement (Effective Date of Program)

Sutter County Superintendent of Schools (“SCSOS”) is committed to the safety and health of all employees. We refuse to tolerate any form of violence, or threat thereof, in the workplace and will make every effort to prevent violent incidents from occurring by implementing a Workplace Violence Prevention Program (WVPP).

All staff are responsible for complying with our WVPP Program. SCSOS encourages employee participation in development and implementation in designing a SCSOS. This includes participation in identifying, evaluating, correcting workplace violence hazards, designing and implementing training, and in reporting and investigating workplace violence incidents. To ensure a successful WVPP, prompt and accurate reporting of all violent incidents whether or not physical injury has occurred is required. SCSOS will not discriminate against victims of workplace violence or anyone who reports the same.

A copy of this policy statement and WVPP Plan is written, available, and easily accessible to all staff and will be provided at the beginning of each school year and at the beginning of employment at SCSOS. A written copy will also be posted at the SCSOS Office, each school site, and any other site where SCSOS staff are located.

All employees are responsible and accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.

The WVPP will be reviewed annually, when a deficiency is observed or becomes apparent, and after any workplace violence incident.

Section II: 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, 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.

Section III: Responsibility

The SCSOS Director of Human Resources, and Compliance Officer, are responsible for implementing the WVPP. Sutter County Superintendent, Tom Reusser, shall approve the final plan and approve any major changes after implementation.

In addition, a WVPP Committee will be established to assess the vulnerability to workplace violence at SCSOS and reach agreement on preventive actions to be taken. This group will be responsible for developing employee training programs in violence prevention and steps for responding to acts of violence. They will also review and audit SCSOS's overall Workplace Violence Prevention Program.

The WVPP Committee will consist of the individuals holding the following positions:

- Deputy Superintendent
- Assistant Superintendent of Special Education
- Assistant Superintendent of Educational Services
- Assistant Superintendent of Business Services
- Director of Human Resources
- Compliance Officer

Section IV: Involvement of Staff and Authorized Employee Representatives in Development and Implementation

SCOS ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- SCOS will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence. SCSOS will have bi-annual safety meetings with employees and their representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.
 - Designing and implementing training. Employees are encouraged to participate in designing and implementing training programs, and their suggestions are incorporated into the training materials. For example, an employee might suggest a new training scenario based on a recent incident.
 - Reporting and investigating workplace violence incidents.
- SCSOS will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Administrators and supervisors will enforce the rules fairly and uniformly.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

Section V: Coordination with Other Employers

SCSOS may engage outside employers to conduct work and/or services at SCSOS sites. Other employers are required to have their own WVPP, as required by law. SCSOS will work with any employer who SCSOS engages for services to ensure there is not contradiction in roles and responsibility of employees.

Section VI: Compliance

SCSOS requires safe work behavior from all employees. Noncompliance is not permitted and may result in discipline, up to and including termination.

Our system ensures that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions that create a security hazard for others in the workplace, including at a minimum:

- Training employees, supervisors, and managers in the provisions of SCSOS Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP through yearly training and monitoring by Administrators and supervisors throughout the year.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace.
- Employees who fail to comply with WVPP may also be subject to discipline aligned to procedures in existing collective bargaining agreements (CBA)

Section VII: Communication, Reporting Workplace Violence, and Response to Investigation

Matters concerning workplace violence will be communicated to employees by written documentation, meetings, training and/or postings. Communication from employees about workplace violence is encouraged and may be verbal, written, or electronic. Employees may also send anonymous recommendations through intra-office mail, email, or phone calls. No employee will be subjected to termination, retaliation, or discrimination for making complaints, instituting proceedings, testifying with regards to employee workplace violence, or reporting a workplace violence incident.

Any report of workplace violence will be investigated by SCSOS and/or appropriate law enforcement agency. The District will inform the reporting employee, if known, the results of the investigation and corrective action taken, if any.

Section VIII: Workplace Violence Response Procedures

SCSOS 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:
 - Catapult Alert System
 - PA alert systems at the site (where available)
 - Emergency Phone Tree

All SCSOS sites have evacuation and/or shelter-in-place safety plans. Please see your site specific safety plans for more detailed information.

- How to obtain help from staff, security personnel, or law enforcement
 - If there is immediate danger, call for emergency assistance by dialing 9-1-1
 - If situation permits then notify Compliance Officer, Elizabeth Bhatti at ext. 2933
 - Site Specific phone extensions/phone numbers
 - Klamath Ext. 2900
 - Sutter County Adult Education Center Ext 5810
 - Sutter County One Stop Ext. 5120
 - Student Support & Outreach Ext. 2968
 - Feather River Academy/Pathways Charter Academy Ext. 2400
 - Yuba City Special Education Secretary (530)674-4900
 - Butte Vista Special Education Secretary (530)822-5034
 - Riverbend Special Education Secretary (530)822-3110

Section IX: Identify, Evaluate, and Correct Workplace Violence

Whenever a workplace violence condition is observed, discovered, or reported, SCSOS will take appropriate corrective measures in a timely manner. Employees will be informed of the workplace violence condition and interim protective measures will be taken until the workplace violence incident is corrected. In the event of an imminent workplace violence, all impacted employees will be removed from the area at the earliest and safest opportunity, except those assigned to correct the workplace violence.

Section X: Post Workplace Violence Response and Investigation

All workplace violence incidents will be reported immediately to your supervisor. Your supervisor will complete the required forms by collecting information regarding the workplace violence incident and submit the forms to the Director of Human Resources and the Compliance Officer who will review the information provided and determine if further investigation is warranted.

After a workplace incident, the WVPP administrator or their designee will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.

The violent incident log will be used for every workplace violence incident and includes information, such as:

- The date, time, and location of the incident.
- The workplace violence type or types involved in the incident.
- A detailed description of the incident.
- A classification of who committed the violence, including whether the perpetrator was a 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.
- 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.
- A classification of where the incident occurred, such as in the workplace, parking lot, or other area outside the workplace, or other area.
- The type of incident, including, but not limited to, whether it involved any of the following:
 - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - Animal attack.
 - Other.
- Consequences of the incident, including, but not limited to:
 - Whether security or law enforcement was contacted and their response.
 - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident
 - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents.
- Other Supports (ex. Time off work, Employee Assistance Program, etc.)

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.

The reporting individual, if known, will be informed of the completed investigation and corrective measures taken, if any.

Section XI: Workplace Violence Hazard Identification and Evaluation

The following policies and procedures are established and required to be conducted by SCSOS to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard. Prompt reviews of all submitted/reported concerns of potential hazards can be done:
 - Online form for reporting workplace violence hazards (available on the SCSOS website)
 - Form submittal can be anonymous
 - Voicemail/email/text messages or other communications

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence.

Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the following safety team led by the designated personnel in the following sites of SCSOS:

Site Specific Person & Job Title	SCSOS Site
Director FMOF & Compliance Officer	Klamath, OneStop, Adult Education Center, FRA/PCA, and SSO
Special Education Principals	Sites Assigned
FRA & PCA Principals	Sites Assigned

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for areas of illegal entry.
- The need for surveillance measures, such as mirrors and cameras.
- Procedures for employee response during an emergency, including our policy prohibiting employees, who are not security guards or law enforcement, from confronting violent persons or persons committing a criminal act (See Site Safety Plan).
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency alerts, alarms, and Catapult use.
- 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 where they can go in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by students and staff
- Employees' skill in safely handling threatening or hostile service recipients (CPI training)
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms, panic buttons, Catapult.
- 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.

Section XII: Workplace Violence Hazard Identification and Evaluation

Workplace violence hazards will be evaluated and corrected in a timely manner. SCSOS will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.
- All corrective actions taken will be documented and dated on the appropriate forms.
- Corrective measures for workplace violence hazards will be specific to a given work area.

Section XIII: Periodic Review and Revision of Workplace Violence Prevention Plan

The WVPP will be reviewed for possible revision at least annually. The WVPP will also be reviewed for possible revision when any deficiency is observed or becomes apparent and after each incident. Employees and their authorized representatives are encouraged to have active involvement in the review process.

Section XIV: Training

The Director of Human Resources and the SCSOS Compliance Officer, will ensure that employees receive training to familiarize them with the workplace prevention plan, how to obtain the plan and participate in implementation, definitions, how to report workplace violence, and incident logs. Training will be conducted at the implementation of the plan, upon hire, annually, and again upon the establishment of new programs, or when new job assignments, substances, processes, procedures, equipment or hazards are introduced or discovered. All employees will have an opportunity to participate in a question and answer session with an individual who is knowledgeable about SCSOS's plan.

SCSOS will provide its employees with training and instruction on the definitions found on pages one (1) and two (2) of this plan and the requirements listed below:

- SCSOS's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in the development and implementation of the plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures SCSOS has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- Opportunities SCSOS has for interactive questions and answers with a person knowledgeable about the Yuba City Unified School District plan.
- Strategies to avoid/prevent workplace violence and physical harm, such as:
 - How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
 - Ways to defuse hostile or threatening situations.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
 - Employee routes of escape.
 - Emergency medical care provided in the event of any violent act upon an employee
 - Post-event trauma counseling for employees desiring such assistance.

Section XV: Employee Access to Written WVPP

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

- An employee or designated representative may request a copy of the written WVPP, we will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.
- Printed copies are also available at the SCSOS administrative office and each SCSOS work site
- WVPP also available on the SCSOS website

Section XVI: Recordkeeping

Records of training, audits, incidents, investigations, and corrections made will be maintained as required by law.