

Workplace Violence Prevention Plan

Conejo Valley Unified School District

May 29, 2024

PURPOSE AND INTENT

The purpose of this plan is to prevent and minimize the hazards of workplace violence to employees of the Conejo Valley Unified School District by enabling the district to evaluate the risk of potential violence and then design and implement protection measures to address those risks. The plan is designed to address the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#)

APPLICATION

This plan applies to all CVUSD employees and to all independent contractors working within the district's on-site educational programs.

EMPLOYEE INVOLVEMENT

The district is committed to employee involvement in its Workplace Violence Prevention Plan (WVPP, the "Plan"). Employees are instructed to report all instances of workplace violence, including threats of violence and any potential workplace violence hazards, to their supervisor.

The participation of Authorized Employee Representatives who are members of the Safety Advisory Committee shall be included in:

- reporting workplace violence concerns to the committee for investigation and resolution;
 - reviewing this workplace violence prevention plan;
 - reviewing analysis of workplace violence incident data used to identify and remediate trends in the types of incidents in the workplace; and
 - reviewing the effectiveness of mitigating actions taken.
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DEFINITIONS

The terms below have the following meanings for the purposes of this plan:

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 required by LC section 6401.9.

Plan - The workplace violence prevention plan 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 which are used to effectively reduce workplace violence hazards.

RESPONSIBILITY

The Superintendent or designee has ultimate authority and responsibility for the implementation of this plan. The responsibility for plan development, monitoring, revision, and day-to-day implementation will apply as follows:

Risk Management – The Director of Safety & Risk Management is responsible for overseeing plan development, monitoring/review/analysis of violence concerns and incident reports, investigations, and maintaining plan records. In addition, the director will advise in and assist with the development of policies, procedures, and training programs required and relative to the plan.

Management Team – All department heads, administrators, and supervisors are responsible for implementing the plan within their work areas and to ensure that employees receive the appropriate training on workplace violence prevention and that they are following individual employee responsibilities.

All Employees and Site Independent Contractors – All staff will follow workplace violence prevention plan directives, policies, and procedures. Staff are responsible for actively participating in required workplace violence prevention training and drills, and in reporting security hazards and incidents of workplace violence.

COMPLIANCE

The district is committed to ensuring that all safety and health policies and procedures involving workplace violence prevention are clearly communicated and understood by all employees. All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe, healthy and secure work environment. Our system of ensuring that all employees, including supervisors and managers, comply with plan requirements include:

1. Training employees, supervisors, and managers about the provisions of the district's Workplace Violence Prevention Plan (WVPP) when they are hired and periodically through memos, electronic mail, staff meetings, and training.
2. Supervising employees to ensure compliance with the district's WVPP.
3. Providing training and/or Employee Assistance Program services to employees whose compliance is deficient with the WVPP.
4. Disciplining employees, in accordance with Board policy and collective bargaining agreements, for failure to comply with WVPP.
5. Ensuring proper posting of the district's WVPP on the district's website.

COMMUNICATION

The district recognizes that to maintain a safe, healthy, and secure workplace we must communicate to all employees, including managers and supervisors, all pertinent information related to workplace safety, health, and security. We have a communication system designed to encourage a continuous flow of safety, health and security information between management and our employees without fear of reprisal and in a form that is readily understandable. We will communicate the WVPP policies and procedures through:

1. New employee orientation and training.
 2. Periodic review of our WVPP with all employees during staff meetings and group training to include the importance of reporting threats and incidents of workplace violence and security hazards or concerns.
 3. Training programs designed to address specific aspects of workplace violence prevention and security that are unique to PK-12 school facilities and programs.
 4. Posting and distributing workplace violence prevention plan information.
 5. Advertising the use of the district's WeTip reporting platform for the reporting of security and safety concerns. Administrators are responsible for following up on tips submitted and to provide acknowledgement to the person submitting the report when applicable.
 6. Protecting employees who report incidents of workplace violence from retaliation by the person making the threats.
 7. Including security issues in the agenda of the Safety Advisory Committee meetings. The committee will recommend solutions to Risk Management who in turn will communicate those concerns to the appropriate members of the Executive Cabinet.
 8. Ensuring public address systems and radio equipment are functional for use in emergency communication.
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COORDINATION WITH OTHER EMPLOYERS

Independent contractors performing work at district worksites will be required to have in place a Workplace Violence Prevention Plan that meets the requirements of current California law. Independent contractor employees who work directly with staff and/or students will be required to comply with all applicable aspects of the district's WVPP.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

All threats or acts of workplace violence are reported to the site administrator with a copy of the report also being sent to the Director of Safety & Risk Management. This will be accomplished as described below. If that's not possible, employees will report incidents directly to their immediate supervisor who will forward the report to the Risk Management Department.

- Report the incident of violence by means of the confidential WeTip phone-based reporting system.
 - As an alternative to using the WeTip reporting system, an employee may report the incident directly to their immediate supervisor by submitting to them a completed Report of Workplace Violence Incident.
 - If the incident has resulted in physical or mental injury to the employee, they must report this to *Company Nurse* by 24-hour telephone reporting service. This will generate a report to Risk Management and the district's workers' compensation claim administrator.
 - A strict non-retaliation policy is in place, and any instances of retaliation will be formally investigated with violators subject to discipline up to and including termination.
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EMERGENCY RESPONSE PROCEDURES

CVUSD has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Public address systems, handheld radios, and mass communication text messaging to alert employees to a violence emergency.
 - Established response protocols that are practiced in drills: relocate, shelter defense, and self-defense.
 - Post incident provisions including first aid/trauma kits, staff trained in use of trauma kits, and an established relationship with local law enforcement.
 - Counselors able to provide post trauma mental health counseling and referral.
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WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The Conejo Valley Unified School District Workplace Violence Prevention Plan includes the following elements to ensure that workplace violence hazards are identified and evaluated:

- Each school is required to update their Comprehensive School Safety Plan each year. These plans require an assessment of site security needs with consideration to both internal and external threats. Plans are updated with input from staff, parents, and the site's School Resource Officer.
- District representatives participate in monthly VCSSFA school safety and security seminars which teach leading school security policy and practice. The district will continue to implement recommended protocols.
- Site security considerations are part of the annual site safety inspections conducted by Risk Management.
- Each incident of workplace violence will be investigated to identify additional preventive measures.
- Workplace violence incident data will be analyzed to inform prevention strategies.
- All safety and security concerns reported to Risk Management will be fully investigated.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. The site administrator or department head will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence incident 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.
 - A student exhibiting violent behavior will be handled using non-violent crisis intervention techniques whenever possible. Staff trained in these techniques will use approved methods for protecting students and employees from injury.
 - In the event of an active assailant that threatens severe bodily injury, staff have been instructed to evaluate the situation and to relocate to a place of refuge, create a refuge from the attacker, or engage in subduing the attacker until law enforcement personnel arrive.
- All corrective actions taken will be documented and dated on the appropriate forms. All corrective action will be documented on the Workplace Violence Incident Log contained within the WeTip incident reporting system.
- Corrective measures for workplace violence hazards will be specific to the given incident, but with the goal of improving district wide violence prevention.
- Corrective measures may include any of the following:
 - Training or retraining in non-violent crisis intervention techniques.
 - Emergency response training for district employees.
 - Providing specialized PPE for staff working with potentially aggressive students.
 - Improving visitor management systems and protocols.
 - Addition or adjustment of surveillance cameras.
 - Expanding the placement of first aid/CPR/Trauma Kit equipment.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the site administrator or direct supervisor of the affected employee(s) will implement the following post-incident procedures:

- Ensure that the affected employee(s) have reported the event by use of the WeTip incident reporting system.
- If an employee was injured in the event, have them report their injury to *Company Nurse*.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Examine the workplace for all risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator and develop appropriate corrective action plans.
- The violent incident log will be used for every workplace violence incident and will include 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 student, family or friend of a student, stranger with criminal intent, co-worker, 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.
 - All personal identifiable information will be kept confidential and will not be made publicly available.
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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:

- When the WVPP is first established.
- Annually to ensure all employees understand and comply with the plan.

- Whenever a new or previously unrecognized workplace violence hazard has been identified and when major changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or major changes to the plan.

The Human Resources Department will provide employees with general online training covering workplace violence prevention and instruction on the definitions found in this plan and the requirements listed below:

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to contribute suggestions for improving the plan.
- How to report workplace violence incidents or concerns without fear of reprisal.
- How to obtain workplace violence incident data for their work site.

The employee's supervisor will be responsible for providing training on the following:

- Job specific measures for preventing and responding to a potential violent situation including the use of non-violent crisis intervention techniques to de-escalate the tension.
- Site specific response procedures in the event of an active assailant.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

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

- Whenever an employee or designated representative requests 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.
- We will provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the written WVPP.

RECORDKEEPING

CVUSD will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of 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 a minimum of five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.

PLAN REVIEW

The district will review and update its Workplace Violence Prevention Plan on an annual basis with input from the Authorized Employee Representative(s). The review will include an assessment of the plan's effectiveness in reducing the potential and frequency of incidents of workplace violence. Modifications will be made accordingly.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs (with any personal identifiable information redacted).

Report of Workplace Violence Incident

(Alternative to WeTip Report of Incident)

Instructions: Complete this form after an incident of violence (threat or physical attack) and provide it to your supervisor, or to the Assistant Superintendent of Human Resources, or the Director of Safety & Risk Management.

Date of Incident: _____ Time: _____ Worksite Location: _____

Specific Location at Worksite: _____ Your Name: _____

Perpetrator's Name: _____ Student ___ Employee ___ Other: _____

Witness Name(s): _____

Detailed Description of Incident: _____

Were you injured? Yes ___ No ___ If injured, did you report this to *Company Nurse**? Yes ___ No ___

*All workplace injuries should be reported immediately to your supervisor and to *Company Nurse*, (855) 602-5267