

The Harker School

Workplace Violence Prevention Plan

Plan last updated: **June 12, 2024**

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COMMITMENT TO PREVENTING AND ADDRESSING WORKPLACE VIOLENCE

We are committed to creating a positive, caring, and safe work environment, which includes taking initiative to maintain a secure work environment and practice safe work habits. This Workplace Violence Prevention Plan (WVPP or Plan) of The Harker School (Company) is designed with our Company values in mind while complying with the applicable law, and operates along other Company policies relating to workplace safety including our Emergency Action Plan.

The purpose of the WVPP is to protect employees, as well as visitors, students from any threat of violence or workplace violence, and effectively address such incidents should they arise. The Plan does not apply to employees who are teleworking from a location of their choice, which is not under the Company's control.

You should be familiar with the Company's WVPP and your role in preventing and addressing incidents of workplace violence. If you have questions, your supervisor, the WVPP Administrator, and the management team are all available to answer them.

Thank you for all you do to create and foster a safe and secure work environment.

IMPORTANT DEFINITIONS

"Emergency" means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

"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 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.

Workplace violence does not include lawful acts of self-defense or defense of others.

There are four types of workplace violence:

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 workers 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.

RESPONSIBILITY FOR IMPLEMENTING THE PLAN

The WVPP summarizes individual responsibilities, how we strive to safeguard employees, visitors and students while ensuring continuity of operations, and specific tools and procedures for doing so. While compliance is critical, our overarching goal is worker safety.

The WVPP Administrator identified below and has overall authority and responsibility for implementation of the provisions of the WVPP. The WVPP Administrator can be reached at the contact information below. The WVPP Administrator, or designee, works closely with management in the formation and support of the WVPP Review Group, which will be responsible for addressing workplace violence issues at the individual facility level. The additional roles work closely with the WVPP Administrator in the formation and implementation of the WVPP:

Function	Name/Title	Contact Information
WVPP Administrator	Shayne Hale / Facilities Director	Work phone: (408) 345-0101 Cell phone: (408) 489-2628
HR Coordinator	Marissa Locketti / HR Director	Work phone: (408) 553-5778 Cell phone: (408) 910-9363

<p>Site based Division Leaders</p>	<p>The Harker School, Lower School Campus:</p> <ul style="list-style-type: none"> - Kristin Giammona - Debra Cope <p>The Harker School, Middle School Campus:</p> <ul style="list-style-type: none"> - Evan Bath <p>The Harker School, Upper School Campus:</p> <ul style="list-style-type: none"> - Paul Barsky 	<p>Work phone: (408) 553-0534</p> <p>Email: Kristin.giammona@harker.org</p> <p>Work phone: (408) 553-0553</p> <p>Email: debra.cope@harker.org</p> <p>Work phone: (408) 553-0330</p> <p>Email: evan.barth@harker.org</p> <p>Work phone: (408) 345-9673</p> <p>Email: paul.barsky@harker.org</p>
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WVPP Administrator. The WVPP Administrator will ensure that^[2] :

- The Plan is complete and updated as required.
- The Plan is available to all employees.
- Oversee workplace violence hazard assessment and inspections, as appropriate, to evaluate the work tasks of all employees to determine the presence of hazards, conditions, operations, and other situations that might place workers at risk of workplace violence incident in the workplace.
- Review previous incidents of violence or threats of violence in the workplace and other records identifying patterns that may indicate causes and severity of incidents and identify changes necessary to correct hazards.

HR Coordinator and Site Based Facility Manager. The HR Coordinator and Site Based Facility Manager will:

- Implement the provisions of the Plan with assistance from the management/supervisor team, Safety Committee, and all employees.
- Ensure all managers and supervisors are trained in their individual safety responsibilities related to the Plan.

Managers and Supervisors^[3] . Managers and Supervisors must:

- Inform team members of Plan and enforce compliance.
- Ensure employees know specific procedures for dealing with workplace threats and emergencies, and how to contact police, fire, and other safety and security officials.
- Ensure employees with special needs are aware of emergency evacuation procedures and have assistance (as necessary) regarding emergency evacuation situations.
- Respond to potential threats and escalating situations by utilizing proper resources from local law enforcement and medical services, Human Resources staff, and the Employee Assistance Program (EAP).
- Coordinate policies, plans, and procedures with state agencies as applicable.
- Promote positive behavior and lead by example through modeling appropriate behavior and by treating employees and customers with respect and dignity.

- Contribute to creating a workplace where established standards of conduct are clear, communicated, and consistently enforced, and where corrective action, including discipline, is used fairly to deal with instances of unacceptable behavior.
- Treat all reports of violence or threats of violence seriously.
- Understand that individuals participating in or tolerating workplace violence or retaliation are subject to discipline up to and including termination.
- Report all potential violence or acts of violence regardless of individual or behaviors witnessed on agency workplace violence to HUMAN RESOURCES and/or your site Division Director.

EMPLOYEE ACCESS

A copy of this WVPP is also available and accessible to employees electronically on Faculty and Staff Portal at: www.harker.org. In addition, the WVPP is available to employees, and the Division of Occupational Safety and Health upon request to the WVPP Administrator.

INVOLVEMENT OF EMPLOYEES

The Company encourages active involvement of employees in developing and implementing the Plan. The Company's WVPP Review Group^[5] is responsible for reviewing the WVPP and overseeing the development and implementation of that Plan. The WVPP Review Group, led by the WVPP Administrator or designee, includes one or more non-management employees or otherwise seeks input from employees. The WVPP Review Group oversees the identification, evaluation and correction of workplace violence hazards, design and implementation of training, and the reporting and investigation of workplace violence incidents. To participate in the WVPP Review Group, please contact the WVPP Administrator.

COORDINATION WITH OTHER EMPLOYERS

The Company will coordinate implementation of the Plan with any other employers whose employees work in the workplace to ensure that those employers and employees understand their respective roles under this Plan. The employees of such other employers must complete training on workplace violence prevention and such employers must ensure that workplace violence incidents involving any employees are reported, investigated, and recorded.

ACCEPTING AND RESPONDING TO REPORTS OF WORKPLACE VIOLENCE

Employees are required to report threats or acts of workplace violence to a manager or supervisor, or the WVPP Administrator. The Company will take appropriate measures in response. See incident response procedures below.

The Company strictly prohibits retaliation against any employee for making a report of workplace violence.

COMPLIANCE

Managers and supervisors are responsible for ensuring that all safety and health policies and procedures related to 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 for assisting in maintaining a safe work environment, and, for promoting safety whenever and wherever possible.

Managers and supervisors are trained, and retrained as appropriate, on the WVPP. Managers and supervisors are expected to enforce the rules and expectations fairly and uniformly and without any retaliation. The following is our system of ensuring that all workers comply with the work practices designed to prevent against workplace violence incidents, ensure they are properly addressed when they occur, and maintain a safe work environment:

1. Inform employees, supervisors and managers of the provisions of our WVPP;
2. Train employees, supervisors, and managers of the provisions of the WVPP when the Plan is first established, and annually thereafter;
3. Train all new employees and all employees given a new job assignment of the provisions of the WVPP when they are hired;
4. Provide training to instruct employees on general safe and healthy work practices and providing specific instruction with respect to hazards specific to each employee's job assignment;
5. Evaluate the performance of all employees in complying with our establishment's workplace security measures;
6. Identify and evaluate workplace hazards, including scheduling periodic inspections to identify unsafe conditions and work practices and promptly correcting any unsafe or unhealthy conditions or work practices;
7. Recognize employees who perform safe and healthful work practices;
8. Provide retraining to employees who do not meet expectations relating to the WVPP;
9. Provide a system for communicating with employees about occupational health and safety matters, including a means that employees can use to inform the employer of hazards at the worksite without fear of reprisal;
10. Provide special precautions for employees exposed to external workplace violence; and
11. Discipline employees for failure to adhere to the WVPP.

COMMUNICATION

The Company recognizes that to maintain a safe and secure work environment it must maintain communication on matters of workplace violence with all employees, including the employees of other employers that work in the facility. The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervisor, and employees) safety, health, and security information in a form that is readily understandable to and between all affected site personnel, and maintained free from fear of reprisal:

1. Workplace-specific training on the WVPP.
2. Effective documentation and communication of information regarding conditions that increase the potential for workplace violence to other workers and between shifts and locations.
3. Posted and distributed safety information, including current safety news and activities, safety reading materials, using a variety of means such as signs, posters, memos, flyers, paycheck inserts, and bulletin boards for easy access to information^[6].
4. A system for reporting workplace violence incidents and concerns. Violent incidents, threats, or other concerns related to workplace violence should be directly reported to a manager or supervisor, or the WVPP Administrator. Employees will not be prevented from accessing their mobile or other communication device to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. **Retaliation against any employee for reporting an incident, threat, or other workplace violence concern is strictly prohibited.**
5. A system for protecting employees who report threats from retaliation by the person making the threats of violence. Employees who report incidents of workplace violence will be protected from the person making the threats by the Company immediately taking the appropriate actions such as removing the person, making the threats, from the work area until the situation is resolved. For serious threats or acts of violence, campus based Security staff and/or the local police will be called.

PROCEDURE FOR REPORTING THREATS OR ACTS OF WORKPLACE VIOLENCE

An important part of the communication component of workplace violence prevention is reporting any threats or acts of workplace violence. Employees are required to report such incidents and should do so in accordance with the following:

1. Immediately report all violent incidents, threats or other workplace violence concerns to your supervisor or manager, or the manager on duty, without fear of reprisal.
2. The manager, supervisor or manager on duty will contact law enforcement, if appropriate, and coordinate with law enforcement on the reporting and investigation in the workplace violence incident.

3. Human Resources will complete a Violent Incident Log (Appendix A) and give it to the WVPP Administrator and Human Resources. The WVPP Administrator will inform the reporting employee of the results of the investigation and any resulting corrective actions taken.

INCIDENT RESPONSE

The WVPP Administrator is responsible for developing procedures for responding to actual or potential workplace violence emergencies including effective means to alert employees of the presence, location, and nature of workplace violence emergencies, evacuation or sheltering plans as appropriate and feasible, and how to communicate with and obtain help from staff assigned to respond to workplace violence emergencies, security personnel or law enforcement, as applicable.

The Company will follow the following procedures when responding to actual or potential workplace violence emergencies, including, but not limited to, all of the following:

1. Alerting employees of the presence, location, and nature of workplace violence emergencies, and communication practices during such an event by site based alarms and local public address system.

2. Enforcing evacuation or sheltering plans that are appropriate and feasible for the worksite.

- a. Evacuation or sheltering in place are generally directed by the site based Division head or by local emergency professionals. Follow all signage posted in your area for the prescribed evacuation route.

1. Links to site bases evacuation routes:

- 2. Bucknall Campus
- 3. Saratoga Campus
- 4. Union Campus
- 5. Boynton Campus

3. Communication about how to obtain help from staff assigned to respond to workplace violence emergencies, if any, security personnel, if any, and law enforcement.

Shayne Hale, Plan Administrator 408-489-2628

a. Tor Warmdahl, Security Director 408-639-0373

b. Rogel Esguerra, Asst Security Director 408-318-4587

c. Union campus security 408-691-7266

- d. Saratoga campus security 408-639-0743
- e. Bucknall campus security 408-590-0283
- f. Boynton campus security 408-691-1002
- g. San Jose Police 408-277-8900
- h. San Jose Fire 408-794-7000
- i. 9.1.1

4. The Company's procedures when responding to a violent act where one or more persons are injured include:

- a. Anyone involved in a violent attack or who witnesses an attack resulting in an injury that requires more than first aid will contact emergency services.
- b. The injured will be transported to medical care facilities.
- c. The incident will be reported to police and other authorities as required by law.

5. The area where the violent actions occurred will be secured to protect evidence and minimize any disturbance during the post-incident response process.

6. A **Violent Incident Log** will be prepared.

7. Injured persons, witnesses to the incident, and other affected employees will be offered psychological assistance and counseling to reduce trauma and stress.

Active Shooter Incidents

An Active Shooter is an individual who is actively engaged in killing or attempting to kill people in a confined and populated area. Typically, there is no discernable pattern or method to the shooter's selection of victims. Active shooter situations are unpredictable by nature and typically evolve quickly; therefore, situational awareness and preparedness are key in safely responding to an active shooter situation. If an active shooter is detected in your vicinity, law enforcement and the federal government recommend that you take the following actions immediately:

1. Remember: **RUN – HIDE – DEFEND**

2. If it is safe to do so, the first course of action that should be taken is to **RUN**. Be aware of the **nearest exit point at the facility**.
 - Run out of the facility or away from the area under attack.
 - Leave personal belongings behind.
 - Encourage others to exit the facility with you, but once safely away from the area, do not run back into the facility under any circumstances.
 - Remain in the designated location until law enforcement arrives; unless it becomes unsafe and you have to leave the area for a safer location.
 - Designate a team member to call 911 as soon as you are in a safe location far away from the attack. The team member should be prepared to give the address of the facility, the approximate number of suspects and the approximate number of occupants, and any other pertinent information about the attack, if known.

3. If running is not a safe option, or the shooter(s) is blocking the exit, you should **HIDE** in as safe of a place as possible. If you are in an **administrative office or training room**, stay. If you are on the exposed floor of the facility, quickly move towards the nearest office or training room. Once inside the room, take the following steps:
 - Encourage others that may be in the hallways or exposed floor area to quickly enter the sheltered room, using gestures and eye contact. **Do not draw attention to the area by shouting or making noise.**
 - Once people in the immediate vicinity are inside the sheltered room, do not exit the room to retrieve other team members or open the door for any reason until given the all clear by recognizable law enforcement officials.
 - Do not exit the room, even if the fire alarm is triggered, as this may have been done by the shooter to encourage evacuation.

- Lock the doors to the room and close any blinds/shades.
- Turn off the lights in the shelter room and stay out of view of hallways/windows.
- Silence electronics and remain quiet.
- Barricade the door with any available furniture or equipment and take shelter behind any cover available; the goal is to put as many obstacles between yourself and the shooter as possible.
- Identify and retrieve items that may be used as improvised weapons.
- Remain in place until given the all clear by identifiable law enforcement.

4. If running and/or hiding is not an option, and you are confronted with the shooter, as a last resort you should **FIGHT and DEFEND**.

- Don't seek out the shooter for a confrontation.
- Don't fight unless you must (e.g., to save your life or another's life).
- If you don't have a weapon, look for an improvised weapon (e.g., scissors, heavy lamp, fire extinguisher, chair, letter opener, keys, chemical sprays, etc.).
- If you are with others and have the time, quickly plan a simple coordinated attack.
- Be extremely aggressive and try to incapacitate the aggressor as quickly as possible.
- Go for vulnerable areas (e.g., eyes, groin, throat, knees) and don't stop until the shooter is down and out.
- If the shooter is subdued or injured, your focus should then be on exiting the facility as swiftly as possible.

5. Cooperate and do not interfere with the first responders on the scene (police officers, EMT technicians, firefighters, etc.)

When law enforcement arrives:

- Put your hands up and keep them up; the police won't know the good guys from the bad guys.
- Accept the fact that you're not in control; listen, don't argue with the police, and obey orders as quickly as you can.
- Stay calm; the police will have guns, they'll be yelling, and they'll be acting aggressively.

- Provide any information you can, but stop talking if the police are too busy to listen to you.
- Stay where they tell you to go, until they say it's okay to leave.

Once the event is over, supervisors/managers need to remain in the designated safe locations and assist management with accounting for all team members, and delivering information to employees.

Threats of Violence or Violence by Co-Workers, Customers, Clients, or Vendors

The Company has a zero-tolerance policy for violent acts or threats of violence against our employees, customers, clients, or vendors.

We do not allow fighting, threatening words or threatening conduct. Guns or any other weapons are strictly prohibited and not permitted on the premises. Any employee found with any of these items in their possession will be subject to severe disciplinary action, up to and including termination of employment.

No employee should commit or threaten to commit any violent act against a co-worker, customer or vendor. This includes discussions of the use of dangerous weapons, even in a joking manner.

Any employee who is subjected to or threatened with violence by a co-worker, customer, client, or vendor, or is aware of another individual who has been subjected to or threatened with violence, must immediately report this information to the employee's supervisor or manager or Human Resources. All threats must be taken seriously.

TRAINING

All employees at the workplace, including management employees, receive effective training on workplace violence prevention when the WVPP is first established, and annually thereafter.

This training includes:

- The WVPP, how to obtain a copy of the Plan at no cost, and how to participate in the development and implementation of the Plan.
- A review and definitions and requirements under the WVPP.
- How to report workplace violence incidents or concerns to the Company or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employee's jobs, the corrective measures the Company 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 workplace violence hazard identification, evaluation and correction records, training records, and violent incident logs.
- An opportunity for interactive questions and answers with a person knowledgeable about the Company's Plan.

Additional training and instruction will be provided to all personnel whenever the Company is made aware of new or previously unrecognized security hazards. This training may be limited to addressing the new workplace violence hazard or changes to the Plan.

IDENTIFICATION AND EVALUATION OF WORKPLACE VIOLENCE HAZARDS

The Company conducts hazard assessments to identify and evaluate workplace violence hazards and threats of workplace violence. Inspections are conducted as appropriate after the development of the WVPP.

Hazard Assessments

The WVPP Administrator, or designee, performed a comprehensive workplace hazard assessment for workplace violence prevention by completing the **Workplace Violence Hazard Assessment Checklist (Appendix C)** when the WVPP was developed.

Inspections

After the implementation of the WVPP, the WVPP Administrator, or designee, conducts inspections using the **Workplace Violence Hazard Assessment (Appendix C)** with the supplemental categories to identify and evaluate workplace violence hazards and threats of workplace violence. Inspections are performed according to the following schedule:

1. After each workplace violence incident
2. When new or previously unidentified workplace violence/security hazards are recognized
3. Periodic inspections scheduled to occur semi-annually.
4. Inspections for violence prevention/security hazards consist of identification and evaluation of workplace hazards and changes in business practices and may require assessing for more than one type of workplace violence. These inspections evaluate risk factors for workplace violence in each unit and area of the facility, including areas surrounding the facility such as parking lots and outdoor areas.

Environmental risk factors will include, among others:

1. Employees working in locations isolated from other employees (including employees engaging with the public) because of being assigned to work alone or in remote locations, during night or early morning hours, or where an assailant could prevent entry into the work area by responders or other employees

2. Poor illumination or blocked visibility of areas where possible assailants may be present
3. Lack of physical barriers between employees and persons at risk of committing workplace violence
4. Lack of effective escape routes
5. Obstacles and impediments to accessing alarm systems
6. Locations within the facility where alarm systems are not operational
7. Entryways where unauthorized entrance may occur, such as doors designated for staff entrance or emergency exits
8. Presence of any objects that can be used as weapons in the areas where the public has access

The Company performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace hazards.

Inspections for assessing Type 1 Violence security hazards:

1. The exterior and interior of the workplace for its attractiveness to robbers
2. The need for security surveillance measures, such as mirrors or cameras
3. Posting of signs notifying the public that limited cash is kept on the premises
4. Procedures for worker response during a robbery or other criminal act
5. Procedures for reporting suspicious persons or activities
6. Posting of emergency telephone numbers for law enforcement, fire and medical services where workers have access to a telephone with an outside line
7. Limiting the amount of cash on hand and using time access safes for large bills

Inspections for assessing Type 2 Violence security hazards:

1. Access to, and freedom of movement within, the workplace
2. Adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems
3. Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment
4. Workers skill in safely handling threatening or hostile service recipients
5. Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms
6. The use of work practices such as “buddy” systems for specified emergency events
7. The availability of worker escape routes

Inspections for assessing Type 3 Violence security hazards:

1. How well our Company's anti-violence policy has been communicated to employees, supervisors and managers
2. How well our Company's management and employees communicate with one another
3. Our employees,' supervisors,' and managers' knowledge of the warning signs of potential workplace violence
4. Access to, and freedom of movement within, the workplace by non-workers, including recently discharged workers or persons with whom one of our worker's is having a dispute
5. Frequency and severity of worker reports of threats of physical or verbal abuse by managers, supervisors or other workers
6. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace
7. How well our Company's restraining order policy has been communicated to workers, supervisors or managers

Inspections for assessing Type 4 Violence workplace security:

1. Assess the factors for Type 3 Violence above
2. Frequency and severity of worker reports of threats of physical or verbal abuse by a person who has a personal relationship with the employee
3. Frequency and severity of worker reports of threats by individuals with history of violent/threatening behavior
4. Frequency and severity of domestic violence situations brought to work
5. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of violence by a person who has a personal relationship with an employee

PROCEDURES TO CORRECT IDENTIFIED WORKPLACE VIOLENCE HAZARDS

The Company will, under the authority of the WVPP Administrator or designee, correct unsafe or unsafe conditions, work practices, and work procedures in a timely manner based on the severity of the hazard: (A) When observed or discovered; and, (B) When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.

If an identified corrective measure cannot be implemented within this timeframe, the Company will take interim measures to address any imminent or serious hazard while completing the permanent control.

Corrective measures may include, but are not limited to:

Type 1 Violence

Corrective measures for Type 1 Violence security hazards may include, but are not limited to:

1. Making the workplace unattractive to robbers and other criminal acts
2. Utilizing security guards or surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace
3. Reporting procedures for notifying designated employees of suspicious persons or activities
4. Posting emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line
5. Posting signs saying cash register only contains minimal cash
6. Leaving a clear unobstructed view of cash register from street
7. Limiting cash on hand and using a drop safe, limited access safe, or similar
8. Using armed services to pick-up cash
9. Training on emergency action procedures for employees, supervisors and managers
10. Using alarm systems and access control systems
11. Addressing adequate lighting
12. Addressing employee isolation factors
13. Using alarm systems and access control systems
14. Increasing police patrol in area
15. Posting laws against assault, stalking, or other violent acts

Type 2 Violence

Corrective measures for Type 2 Violence security hazards may include, but are not limited to:

1. Training
2. Controlling access to the workplace and freedom of movement within it, consistent with business necessity
3. Examining and addressing employee isolation
4. Ensuring adequate workplace security/access control systems, such as door locks, security windows, physical barriers, and restraint systems
5. Providing worker training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
6. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons
7. Providing procedures for a “buddy” system for specified emergency events.
8. Ensuring adequate emergency escape routes
9. Eliminating access to potential weapons
10. Providing security personnel
11. Maintaining an accurate history of problem clients and notifications to employees
12. Posting laws against assault, stalking, or other violent acts

Type 3 Violence

Corrective measures for Type 3 Violence security hazards may include, but are not limited to:

1. Communicating effectively our company’s workplace violence prevention policy to all employees, supervisors, and managers.
2. Enforcing policy of no tolerance for workplace violence
3. Implementing policy prohibiting weapons
4. Improving how well our establishment’s management and employees communicate with each other
5. Increasing employees, supervisors’, and managers’ awareness of the warning signs of potential workplace violence

6. Controlling access to, and freedom of movement within, the workplace by non-employees, including recently discharged employees or persons with whom one of our employee's is having a dispute
7. Providing counseling to employees, supervisors or managers who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of co-workers
8. Ensuring all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the aggressor
9. Ensuring worker disciplinary and discharge procedures address the potential for workplace violence
10. Providing security
11. Posting laws against assault, stalking, or other violent acts
12. Applying crime prevention measures through environmental design and administrative measures

Type 4 Violence

Corrective measures for Type 4 Violence security hazards include, but are not limited to:

1. Providing domestic violence training
2. Enforcing policies on handling and preventing, violence situations
3. Restraining orders
4. Control access to the workplace and freedom of movement within it, consistent with business necessity
5. Enforce policy prohibiting weapons
6. Reporting procedures
7. Relocating work site or staggering work hours
8. Necessary staff notifications on restraining orders or potential threats
9. Personnel security

Post laws against assault, stalking, or other violent acts

POST-INCIDENT RESPONSE AND INVESTIGATION

When a violent incident takes place, the WVPP Administrator, or designee, will promptly conduct a post-incident response and investigation.

Post-Incident Response

The procedures for post-incident response include:^[9]

1. Providing immediate medical care or first aid to employees who have been injured in the incident
2. Taking any measures necessary to prevent others from being injured
3. Identifying all employees involved in the incident
4. Assess whether any additional threats could arise because of or in conjunction with the incident
5. Conducting a post-incident debriefing session as soon as possible after the incident with all employees, supervisors, and security involved in the incident
6. Checking in with affected team member(s) by asking how they are doing and what they need including connecting them with the **employee assistant program (EAP)**, as needed.
7. Following Human Resources and any agency procedures for reporting and filling out forms
8. Evaluating the incident for gaps or deficiencies in emergency response plans

Once a threat has subsided and immediate safety and health concerns have been addressed, the attention of the Company's leadership, managers, supervisors, and Human Resources staff should turn to the well-being of team members. If an incident is severe enough to cause team members to leave the workplace, provide guidance on when and where work will resume. When appropriate, leadership may consider whether to offer paid administrative leave.

The EAP is a useful resource when communicating with and providing support to team members on a group or individual basis. Individuals respond differently to stressful situations and EAP is available to help navigate these dynamics. EAP can help address the mental and emotional well-being of team members once all physical threats are resolved. To utilize the EAP, contact (800)-316-2796 or visit www.mutualofomaha.com/eap.

Investigative Procedures

The incident investigation is a systematic method for collecting factual information that makes it possible to accurately reconstruct the workplace violence incident and determine the underlying reasons for the cause of the incident. Once the root causes for the incident have been determined, corrective actions and preventative measures can be identified and effectively instituted. The basic steps in conducting an incident investigation are:

1. Visit the scene of the incident as soon as possible;
2. Involve workers who work in the area or worksite where the event occurred in the incident investigation as they may have some special insight into potential causes and solutions;
3. Identify root causes of the incident. Ask “why” the perpetrator acted, “why” the worker responded in a certain way, etc.;
4. Interview involved workers and any witnesses;
5. Collect and review relevant information, including records related to training, maintenance, inspections, audits, and past incident reports;
6. Collecting facts on what, where, when, and how incident occurred;
7. Examine the area for security risk factors associated with the incident, including any reports of previous inappropriate or violent behavior from the perpetrator;
8. Obtain any reports completed by law enforcement;
9. Determining the cause of the incident and identifying contributing causes;
10. Recording the findings and corrective actions taken;
11. Complete the **Investigation Report Form** (See Appendix B) and **Violent Incident Log** (Appendix A); and,
12. Reviewing and revising the WVPP as needed.

When conducting an investigation, it is important to:

1. Investigate in an objective, fact-finding manner using probing, open-ended questions;
2. Take pictures and preserve all evidence as appropriate; and
3. Protect the privacy of the individual(s) involved.

Once the incident investigation is completed, take corrective action to prevent the incident from reoccurring and record the findings and corrective actions taken on Investigation Report Form.

Violent Incident Log

Human Resources will complete a **Violent Incident Log (Appendix A)** for all reports or incident of workplace violence. A copy will be provided to the WVPP Administrator [and Human Resources], and to any controlling employer (if not the Company) at any multi-employer worksites.

REVIEW OF THE WVPP

The Company will periodically review the effectiveness of the WVPP, including the violent incident logs, and revise the Plan as needed. The WVPP will be reviewed with all managers, supervisors, and employees. The WVPP will be reviewed annually, when a deficiency is observed or becomes apparent, and after a workplace violence incident.

The WVPP Administrator will coordinate the review and development of this Plan. The Plan will be reviewed on an annual basis. Changes may also be made due to information or guidance received from the California Division and Standards Board. Changes will be tracked using a record of changes table. Comments or suggestions for improving this Plan may be provided to Human Resources or the WVPP Administrator.

We encourage active involvement of by all employees and authorized employee representatives in reviewing, developing and implementing the WVPP. We will facilitate active involvement by all employees through their participation in identifying, evaluating, and correcting workplace violence hazards, in designing and implementing training, and in reporting and investigating workplace violence incidents.

We will facilitate active involvement of all employees through periodic reminders in the form of formalized employee training, emails, and other communication for raising awareness about the importance of our workplace violence prevention policies, threat and incident reporting procedures, and incident response practices.

RECORDKEEPING

The Company maintains records as follows:

- Records of workplace violence hazard identification, evaluation, and correction must be created and maintained for a minimum of five years.

- Every incident, post-incident response, and workplace violence injury investigation shall be recorded in a violent incident log. The log will be reviewed annually in conjunction with the review of the WVPP. It must be maintained for a minimum of five years.
- Records of workplace violence training must be maintained for a minimum of one year. Training records will include the dates that training was conducted, the 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.
- Records of workplace violence incident investigations must be maintained for **a minimum of five years**. These records shall not contain “medical information,” as defined in subdivision (j) of Section 56.05 of the Civil Code.

All records required by this subdivision will be made available to the California Division and Standards Board upon request for examination and copying.

The following records will 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 Corrections
- Training records
- Violent Incident Logs

VIOLENT INCIDENT LOG - APPENDIX A^[10]

The information in this log should be elicited from employees who experience workplace violence and be based on any investigative findings, including any witness statement relied upon.

The log must omit personal identifying information of any person involved in the violent incident (e.g., name, address, phone number, etc.)

Violent Incident Log

Date and Time of Incident: am/pm

Location of Incident

Detailed description of the incident:

Workplace Violence Type (*check all that apply*)

- Type 1 Violence: workplace violence committed by a person who has no legitimate business at the workplace but to commit a robbery or other 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 present/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

Who committed the violence?

<input type="checkbox"/> Client/customer <input type="checkbox"/> Family/friend of client/customer <input type="checkbox"/> Stranger with criminal intent <input type="checkbox"/> Co-worker	<input type="checkbox"/> Supervisor/Manager <input type="checkbox"/> Partner or spouse (current or former) <input type="checkbox"/> Parent or relative <input type="checkbox"/> Other _____
---	--

At the time of the incident was the employee(s)?

<input type="checkbox"/> Completing usual job duties <input type="checkbox"/> Working in poorly lit area <input type="checkbox"/> Rushed <input type="checkbox"/> Working during low staffing level <input type="checkbox"/> Working in an unfamiliar or new location	<input type="checkbox"/> Isolated or alone <input type="checkbox"/> Unable to get help or assistance <input type="checkbox"/> Working in a community setting <input type="checkbox"/> Other _____
---	--

Where did the incident occur?

<input type="checkbox"/> In the workplace <input type="checkbox"/> Restroom <input type="checkbox"/> Breakroom/cafeteria	<input type="checkbox"/> Parking lot/other area outside premises <input type="checkbox"/> Other workplace area _____
--	--

Type of incident (check all that apply)

<p align="center">Physical Assault</p> <ul style="list-style-type: none"> <input type="checkbox"/> Biting <input type="checkbox"/> Choking <input type="checkbox"/> Grabbing <input type="checkbox"/> Hair pulling <input type="checkbox"/> Kicking <input type="checkbox"/> Punching <input type="checkbox"/> Slapping <input type="checkbox"/> Pushing <input type="checkbox"/> Pulling <input type="checkbox"/> Scratching <input type="checkbox"/> Spitting <input type="checkbox"/> Other: _____ 	<p align="center">Attack with weapon or object</p> <ul style="list-style-type: none"> <input type="checkbox"/> Firearm <input type="checkbox"/> Knife <input type="checkbox"/> Other object _____ <p align="center">Sexual assault or threat</p> <ul style="list-style-type: none"> <input type="checkbox"/> Rape or attempted rape <input type="checkbox"/> Sexual Assault <input type="checkbox"/> Physical display <input type="checkbox"/> Other unwanted verbal/physical sexual contact <input type="checkbox"/> Other _____ 	<p align="center">Physical intimidation</p> <ul style="list-style-type: none"> <input type="checkbox"/> Stalking <input type="checkbox"/> Threat of physical force <input type="checkbox"/> Threat of use of weapon/other object <input type="checkbox"/> Animal attack <input type="checkbox"/> Other _____
<p align="center">Did the employee receive medical treatment for the injury?</p>	<p align="center"><input type="checkbox"/> Yes</p>	<p align="center"><input type="checkbox"/> No</p>
<p align="center">Was security or law enforcement contacted?</p>	<p align="center"><input type="checkbox"/> Yes</p> <p>Who? _____</p> <p align="center">What was their response?</p> <p align="center">_____</p>	<p align="center"><input type="checkbox"/> No</p>

Actions taken to protect employees from a continuing threat or from other hazards identified as a result of the incident

Report Completed By (Name):	Title:
Date Completed:	

INVESTIGATION REPORT – APPENDIX B^[11]

Workplace Location/Department	Specific location/department where Incident Occurred		
Name of Impacted Employee(s)			
Employee's Occupation		Date of Incident	
Employee leave work due to incident?	* Yes	Date:	Time of Incident
	* No	Time	AM PM
Employee return to work?	* Yes	Date Reported to you:	Time Reported:
	* No		AM PM
Name of Witnesses			

Name and Address of Doctor or Hospital where injured was Treated

What was Employee doing during incident? (Please be specific)

How did the Incident occur? (Please describe fully the events that resulted in injury. Tell what happened and how it happened. Please use separate sheet if necessary.)

Was the employee injured? (If so, the object or Individual that directly injured employee.)

Describe the Injury – part of the body affected

Possible Contributing Factors for Incident^[12]

What corrective actions have or will be taken to address conditions and prevent recurrence?

Investigation conducted

by: _____ (Name)
_____ (Title)

WORKPLACE VIOLENCE PREVENTION HAZARD ASSESSMENT CHECKLIST - APPENDIX

C^[13][14]

This checklist should be used as part of its initial assessment of environmental and risk factors for workplace violence, in developing the Plan. In the “Notes” column, explain the specific circumstances of risk factors identified and/or indicate follow up required on a specific item. Beyond observing the physical environment, this assessment may require review of documents and consultation with employees. In the “Comments” section at the end, indicate what actions are being taken to address the risk factors.

Site:	Yes	No	Notes
STAFFING			
Is there someone responsible for building security? If “yes,” identify that individual.			
Do employees work alone or in isolation?			
Do employees work late at night or during early morning hours?			
Do employees work in remote locations of the facility?			
Is there sufficient staffing to permit those who are assigned (or their designee) to assist with a workplace violence incident to respond to an incident?			
JOB DUTIES			
Do employees work with drugs or medication?			
Do employees handle cash ^[15] ?			
Do employees work with clients or visitors who have a history of violent behavior or behavior disorders?			
Do employees work off site, at customer or other locations (other than remotely from home)?			
Do employees work at shared/co-working locations?			
FACILITY DESIGN			
Are there enough exits and adequate routes of escape?			

Are exits accessible and clearly marked?			
Can exit doors be opened only from the inside to prevent unauthorized entry?			
Is the lighting adequate to see clearly in indoor areas?			
Are there any areas of blocked visibility?			
Are there employee-only work areas that are separate from public areas?			
Is access to work areas only through a reception area?			
Are reception and work areas designed to prevent unauthorized entry?			
Are there physical barriers between employees and potential assailants?			
Could someone hear a worker call for help?			
Are work areas free of objects that could be used as weapons?			
Is furniture in work areas arranged to prevent workers from becoming trapped?			
Is there adequate lighting within the worksite?			
Is there a designated safe area where employees can go to in an emergency?			
SECURITY MEASURES			
Does the workplace have?			
§ Security cameras or closed-circuit TV in high- risk areas?			
§ Door locks?			
§ Internal phone system to activate emergency assistance?			
§ Secured entry (buzzers)?			
§ Communication devices?			
OUTSIDE THE FACILITY			
Have workers expressed safety concerns about walking to and from the workplace?			

Do employees work in high crime areas?			
Are the entrances to the building clearly visible from the street?			
Is the area surrounding the building free of bushes or other hiding places?			
Is video surveillance provided outside the building?			
Is there enough lighting to see clearly outside the building?			
Are all exterior walkways visible to personnel?			
Is there a nearby parking lot reserved for employees only?			
§ Is the parking lot secure?			
§ Is the parking lot free of hiding places?			
§ Is there enough lighting to see clearly in the parking lot and when walking to the building?			
Is there offsite parking that employees use?			
Have neighboring facilities and businesses experienced violence or crime?			
Are there any entryways where unauthorized entrance may occur?			
Is the employee parking garage secure when arriving, leaving, and during changes of shift?			
WORKPLACE PROCEDURES			
Are employees given maps and clear directions in order to navigate the areas where they will be working?			
Is public access to the building controlled?			
Are floor plans posted showing building entrances, exits?			
Are these floor plans visible only to staff and not to outsiders?			

Is other emergency information posted, such as the telephone numbers?			
Are security measures taken to protect workers late at night (escorts, locked entrances, etc.)?			
Are access and freedom of movement within the workplace restricted to those persons who have a legitimate reason for being there?			
Are visitors escorted to offices for appointments (if applicable)?			
Is there an established procedure for signing in visitors?			
Are authorized visitors to the building required to wear ID badges?			
Are identification tags required for staff (omitting personal information other than first name)?			
Is there a procedure for reporting suspicious persons or criminal acts to law enforcement?			
Is there an established liaison with local police and counseling agencies?			
Are broken windows and locks repaired promptly?			
Are alarm systems (panic button alarms, silent arms, personal electronic alarm systems, etc.) being used for prompt security assistance?			
Are security devices (locks, cameras, etc.) tested on a regular basis and repaired promptly when necessary?			
Are escorts or "buddies" provided for people who work in potentially dangerous situations?			
Do employees know to use security escort service after hours?			
After hours, is the building locked down with only one access point?			
Do employees use the "buddy system" when leaving work after hours?			

Are employees able to locate emergency equipment (fire alarm boxes, emergency generator outlets, etc.)?			
Is emergency equipment accessible and free from obstruction?			
Are employees able to locate cellular phones, power failure phones, and/or radios for emergency communication?			
Do employees know proper procedures if a firearm threat is announced?			
Is the employee emergency call back list up to date and available?			
Do employees have access to a telephone with an outline line in the workplace?			
Do employees use the "buddy system" to work together if problems arise?			
Do employees working in the field have cellular phones or other communication devices to enable them to request aid?			
Is there an evacuation or shelter plan for workplace emergencies (fire, earthquake, etc.)?			
Are reference manuals up-to-date and available to employees?			
Is there an established procedure to administer worker discipline?			
Is there an established procedure to discharge a worker?			
Is there a grievance policy available to employees?			
Is there a Safety Committee available as a resource to staff for any hazard concern?			
INCIDENT HISTORY			
Has the worksite experienced violent behavior or threats from strangers?			
Has the worksite experienced violent behavior or threats from customers or clients?			

Has the worksite experienced violent behavior or threats from other employees?			
Has the worksite experienced violent behavior or threats from former employees?			
Has the worksite experienced domestic violence issues?			

RECOMMENDED ACTIONS TO MITIGATE THE RISK FACTORS:

Checklist Completed By: _____

Date: _____

Department/Unit: _____

INSPECTIONS –CATEGORIES IN ADDITION TO THOSE IDENTIFIED ABOVE^[16]

In addition to the factors identified in the above assessment, the following categories are considered as part of the inspection of environmental and risk factors for workplace violence, after each workplace violence incident, whenever the employer is made aware of a new or previously unrecognized hazard, and as otherwise scheduled periodically.

MANAGEMENT COMMITMENT AND EMPLOYEE INVOLVEMENT			
Do managers, supervisors, or employees accept violence or threats of violence as “part of the job”?			
Do employees communicate information about potentially threatening customers or visitors to appropriate staff?			
Does management communicate information to workers about workplace violence incidents?			
Are employees familiar with the company’s workplace violence prevention policy/procedures?			
TRAINING			
Have employees received training on the WVPP?			
Are workers trained in the emergency response plan (i.e., escape routes, notifying proper authorities)?			
Are workers trained on how to ask for assistance by phone or alerting other staff?			
Are workers trained to report violent incidents, threats, or other workplace violence concerns?			
Have employees been trained on the workplace hazards specific to their jobs?			
Are workers trained in how to handle difficult customers or visitors?			
Are workers trained in how to recognize and handle threatening, aggressive, or violent behavior?			
Are workers trained in ways to prevent or defuse potentially violent situations?			

Have employees been trained in verbal de-escalation techniques?			
Are workers trained in personal safety?			
Are workers assigned to respond to incidents of workplace violence adequately trained?			
REPORTS/COMMUNICATION			
Has the WVPP been effectively communicated to workers and their supervisors?			
Do workers, supervisors, and managers have sufficient knowledge of warning signs of potential workplace violence?			
Is there a notification system for alerting workers of emergencies or potential danger?			
Are violent incidents or threats being reported frequently?			
Are workers and their managers aware of how they should report violent incidents, threats, or other workplace violence concerns?			
Are employees required to report incidents or threats of violence, regardless of injury or severity?			
Is the incident reporting system clear?			
Were medical and psychological counseling services offered to employees who have been assaulted or threatened?			

RECOMMENDED ACTIONS TO MITIGATE THE RISK FACTORS :

Checklist Completed By: _____ Date: _____

Department/Unit: _____

[1]Change to job title of individuals listed

[2]Examples of other responsibilities include:

- Perform a comprehensive workplace hazard inspection and assessment for workplace violence prevention when the Plan is first established, after each workplace violence incident, and whenever the Company is made aware of a new or previously unrecognized hazard
- Communicate the provisions of the WVPP to all employees and supervisors
- Ensure records of workplace violence hazard assessment and correction, training, and violent incident and investigations are properly maintained
- Train employees, supervisors, and managers of the provisions of the WVPP when the Plan is first established, and annually thereafter.
- Train all new employees and all employees given a new job assignment of the provisions of the WVPP when they are hired

[3]Adjust based on job titles

[4]Consider identifying the department that would typically handle workplace complaints.

[5]A Review Group is an option for ensuring employee participation. Alternatively, a safety committee could serve this function, or the employer may otherwise elicit employee participation through direct continuous communications with non-supervisory employees.

[6]Modify as applicable

[7]Where there is onsite security.

[8]Consider conducting inspections at least semi-annually

[9]A post incident response, aside from policy change and/or recognizing a new workplace violence hazard, can be providing employees with counseling services to affected employees, or providing EAP services, or time off work, if this is necessary.

[10]The violent incident log must be completed for every confirmed workplace violence incident.

[11]An investigation should be completed after each workplace violence incident.

[12]This response would be deemed an employer admission by Cal/OSHA. Consider consulting with OSHA counsel before completing this section.

[13]This Assessment Checklist should be completed before developing the Plan document and the Plan should account for the identified hazards and resulting corrective measures.

[14]This assessment and inspection checklist may be overinclusive for your business. As such, you may remove risk factors listed that are **unlikely** to occur. However, if there is any possibility of any of the below risks occurring, we do not recommend removing the category.

In turn, the employer may add any unique risk factors applicable to its workplaces, which are not already included.

If so, reference the cash handling/storing procedures. For retail.

This inspection checklist, including the items listed in the assessment checklist above, should be completed during periodic inspections and otherwise when inspection are required.