

# WORKPLACE VIOLENCE PREVENTION PROGRAM for BONITA UNIFIED SCHOOL DISTRICT (BUSD)

Our establishment's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

**Date of Last Review:** June 30, 2024

**Date of Last Revision(s):** June 30, 2024

## 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 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, 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.

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## RESPONSIBILITY

The WVPP administrator, Kevin Lee, Assistant Superintendent, HR has the authority and responsibility for implementing the provisions of this plan for BUSD. If there are multiple persons responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Kevin Lee	Assistant Superintendent, HR	<b>Overall responsibility for the plan;</b> <i>Kevin approves the final plan and any major changes. Kevin is in charge of initial and annual training.</i>	909 971-8200 ext. 5400	Lee@bonita.k12.ca.us
Christine Froio	Risk Manager	<b>Responsible for employee involvement and training;</b> <i>Christine organizes safety meetings and handles any reports of workplace violence.</i> <b>Responsible for emergency response, hazard identification, and coordination with other employers;</b> <i>Christine conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.</i>	909 971-8200 ext. 5295	Froio@bonita.k12.ca.us

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

## EMPLOYEE ACTIVE INVOLVEMENT

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

- Management will work with and allow employees and authorized employee representatives to participate in:
  - Identifying, evaluating, and determining corrective measures to prevent workplace violence.

Management will have periodic safety meetings with representatives of employee groups 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. This will be added to the safety committee meeting agenda periodically with CSEA. We will also review with BUTA.

- Designing and implementing training as needed; Initial and annual training will be reviewed by representatives of each employee association. Additional training may be suggested by representatives of each employee association.
- Reporting and investigating workplace violence incidents.
- Employees are to report any instance of workplace violence to their direct supervisor. The direct supervisor shall notify Christine Froio, Risk Manager. Investigations into an incident of workplace violence may be designated by Kevin Lee or Christine Froio to a site or department manager or a

third party.

- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
- 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.

## **EMPLOYEE COMPLIANCE**

Our system to ensure 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 which create a security hazard for others in the workplace, include at a minimum:

- Training employees, supervisors, and managers in the provisions of BUSD WVPP.
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP. Review monthly records for reporting. Periodically discuss at meetings and with extended cabinet meetings.
- Provide retraining to employees whose safety performance is deficient with the WVPP.

## **COMMUNICATION WITH EMPLOYEES**

We recognize that open, two-way communication between our management team, staff, and other employers, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training program.
- Meetings that address security issues and potential workplace violence hazards.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns to individuals, groups or whole staff.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
  - Employees can anonymously report a violent incident, threat, of other violence concerns through the WeTip at <https://www.wetip.com/submit-a-crime-tip>.
  - In San Dimas contact: Sheriff Department (909) 450-2700
  - In La Verne contact: La Verne Police Department (909) 596-1913
  - Or dial 911 in case of an emergency
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees' concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken via an investigation report summary and action plan.
- Updates on corrective actions are provided to affected employee or employee groups through email and at safety meetings.

# WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

BUSD will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee's supervisor or manager, who will inform the WVPP administrator. This will be accomplished by email, phone call, or in-person. If that's not possible, employees will report incidents directly to the Risk Manager, Christine Froio at (909) 971-8200, ext. 5295 or at [Froio@bonita.k12.ca.us](mailto:Froio@bonita.k12.ca.us).

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. The District prohibits retaliation and will follow the same procedures for investigation of a retaliation claim for workplace violence report as a retaliation claim for a complaint.

## EMERGENCY RESPONSE PROCEDURES

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

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following:
  - Alarm systems and PA announcements may be used to alert employees of emergencies.
  - Email and text messaging may be used to alert employees of emergencies
- BUSD will have evacuation or sheltering plans. Schools will follow the plans in their school safety plan for evacuation and sheltering. Departments will follow the same plan as their emergency response plan for earthquakes for evacuation and sheltering.
- In the event of an emergency, including a Workplace Violence Emergency, you may need to contact the following:

Responsible Persons	Job Title/Position	Phone #	Email
In San Dimas	Sheriff Fire SCE Gas Co Water Co Pomona Hospital Humane Society	(909) 450-2700 (626) 963-1821 (800) 655-4555 (800) 684-8123 (909) 599-7077 (909) 865-9500 (909) 623-9777	
In La Verne	Police Fire SCE Gas Co Water Co Pomona Hospital Humane Society	(909) 596-2531 (909) 596-5992 (800) 655-4555 (909) 307-7070 (909) 599-7077 (909) 865-9500 (909) 623-9777	
Robb Harrison	M & O Director	Ext. 5230	<a href="mailto:Harrison@bonita.k12.ca.us">Harrison@bonita.k12.ca.us</a>

Margaret McDonald	Superintendent Secretary	Ext. 5100	<a href="mailto:McDonald@bonita.k12.ca.us">McDonald@bonita.k12.ca.us</a>
Christine Froio	Risk Manager	Ext. 5295	<a href="mailto:Froio@bonita.k12.ca.us">Froio@bonita.k12.ca.us</a>
Kevin Lee	Asst. Supt. HR	Ext. 5400	<a href="mailto:Lee@bonita.k12.ca.us">Lee@bonita.k12.ca.us</a>

## WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

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

- Investigations shall be conducted after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard. Updates to the individual school safety plan may be required.

Review all submitted/reported concerns of potential hazards:

- Monthly review of all submitted and reported concerns.
- Online form for reporting workplace violence hazards
- Voicemail/email/text messages

### 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 shall be conducted.

Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the following designated personnel in the following areas of the workplace:

Specific Person Name/Job Title	Area/Department/Specific location
Christine Froio / Risk Manager	District Office
Site Principal	13 school sites
Department Manager	Departments (Transportation, Nutrition Services, M & O, District Building, BCA)

Inspections for workplace violence hazards may include assessing:

- The need for surveillance measures, such as cameras.
- Procedures for reporting suspicious persons or activities.
- 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 to in an emergency.
- Adequacy of workplace security systems, such as door locks and fencing.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, such as PA or alarm systems.
- How well our establishment's management and employees communicate with each other in an emergency.
- Access to and freedom of movement within the workplace by non-employees.
- Frequency and severity of employees' reports of threats of physical or verbal abuse.
- Visitor on-campus procedures.

## **WORKPLACE VIOLENCE HAZARD CORRECTION**

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

- All corrective actions taken will be documented and dated on the appropriate logs.
- Corrective measures for workplace violence hazards will be specific to a given work area.

## **PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION**

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 ensuring corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, such as: [See attached Violent Incident Log]
  - 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.
- Support and resources, such as counseling services, are provided to affected employees. These resources could include referrals to counseling services, information about employee assistance programs, and time off work if necessary.

Ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

## **TRAINING AND INSTRUCTION**

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- 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

changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

BUSD will provide its employees with training and instruction on the definitions found on page 1 of 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 participate in development and implementation of the employer's 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 BUSD 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 BUSD has for interactive questions and answers with a person knowledgeable about the BUSD plan.
- Strategies to avoid/prevent workplace violence and physical harm, such as ways to defuse hostile or threatening situations.
- Emergency medical care provided in the event of any violent act upon an employee
- Post-event trauma counseling for employees desiring such assistance.

**Note:** *Employers must use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.*

## **EMPLOYEE ACCESS TO THE WRITTEN WVPP**

BUSD 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:

- 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 access through our district website, which allows an employee to review, print, and email the current version of the written WVPP.

## **RECORDKEEPING**

Bonita Unified School District will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years (each submitted incident log).
- 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 of all persons attending the training sessions.
- Maintain violent incident logs for 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.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

## **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.

## **REVIEW AND REVISION OF THE WVPP**

The Bonita Unified School District WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

- Review of BUSD's WVPP should include, but is not limited to:
  - Review of incident investigations and the violent incident log.
  - Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).
- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. [These revisions could involve changes to procedures, updates to contact information, and additions to training materials.]

## **EMPLOYER REPORTING RESPONSIBILITIES**

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\). Reporting Work-Connected Fatalities and Serious Injuries](#), BUSD will immediately report to Cal/OSHA any serious injury or illness (as defined by [CCR, Title 8, Section 330\(h\)](#)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

I, Kevin H. Lee, Assistant Superintendent, HR of BUSD, hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I believe that these policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety as it relates to workplace violence prevention.

I, Christine Froio, Risk Manager of BUSD hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to ensuring the safety and well-being of our employees and believe that these policies and procedures will help us achieve that goal.

Kevin H. Kee, Assistant Superintendent

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June 30, 2024

Christine Froio, Risk Manager

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June 30, 2024

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