

WORKPLACE VIOLENCE PREVENTION PLAN

WORKPLACE VIOLENCE PREVENTION PROGRAM

Antelope Valley Community College District

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 <u>Labor Code (LC) section</u> <u>6401.9</u>.

Date of Last Review: July 1, 2024

Date of Last Revision(s): July 1, 2024

I, the Superintendent/President of Antelope Valley Community College District, 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.

Dr. Jennifer Zellet, Superintendent/President Antelope Valley Community College District 07/22/24

Date

PROGRAM OBJECTIVES AND POLICY STATEMENT

The Antelope Valley Community College District ("AVC" or "District") is committed to ensuring the safety and well-being of its employees, to providing an environment free of violence or threats of violence, and to safeguarding all employees and all other workers whom the District controls or directs and directly supervises on the job to the extent that workers are exposed to hazards specific to their worksite and job assignment.

The District prohibits and will not tolerate any form of workplace violence by any employee or third party, including customers, clients, vendors, visitors, parents, students, or others, either at the workplace, in or on the District property, or at the District-sponsored events.

This Workplace Violence Prevention Plan ("WVPP" or "Plan") is intended to supplement the general Injury and Illness Prevention Program ("IIPP") required by 8 CCR § 3203. This Plan is in effect at all times in all work areas and is intended to be specific to the hazards and corrective measures for each work area and operation.

The WVPP shall be available to employees, authorized employee organization representatives, and Cal/OSHA at all times.

The District shall provide all safeguards required by law and regulation, including provision of personal protective equipment and training at no cost to the employee, at a reasonable time and place for the employee, and during the employee's paid time.

The primary objective of the WVPP is to prevent and/or eliminate workplace violence as follows:

- Establish and maintain an effective WVPP;
- Provide a safe working environment;
- Establish policies, training, and communications to improve workplace violence prevention; and
- Provide written records of workplace violence incidents and investigations, in accordance with the Plan.

The District hereby authorizes and ensures the establishment, implementation, and maintenance of this Plan and the documents/forms within this Plan. The District is committed to a culture of safety and violence prevention. These policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety of the District's employees.

The WVPP shall be developed and implemented in a manner that is consistent with of the District's obligations under Title IX of the Education Amendments of 1972 ("Title IX"), the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"), and related policies and procedures. When a report is made under the WVPP, the responsible official shall determine whether the report also impacts the District's obligations under Title IX and the Clery Act.

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, 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

RESPONSIBLE PERSONS

The WVPP administrator, Dr. Jennifer Zellet, Superintendent/President, has the authority and responsibility for implementing and maintaining this Plan for the District. Dr. Lauren Elan Helsper, Assistant Superintendent/ Vice President, People, Culture, and Talent ("PCT"), is responsible for employee involvement, training, and reports of workplace violence. The Risk Manager is responsible for organizing safety meetings, coordinating emergency response procedures, and updating training manuals. The Sheriff's Office personnel serve as the District's first responders and law enforcement.

In the absence of Superintendent/President, the person with authority and responsibility for implementation of this Plan is the immediate supervisor of affected employee[s]. All Division/Department heads, managers, supervisors, and employees will be accountable for implementation and maintenance of this Plan. Managers, supervisors, and lead workers are responsible for implementing and maintaining the Plan in their areas of responsibility and will provide day-to-day program support, guidance, and answer questions of individual employees about the District's WVPP.

A copy of this WVPP is available from each manager and supervisor and also available on AVC's website at: https://www.avc.edu/people-culture-and-talent-hr

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Dr. Jennifer Zellet or designee	Superintendent/ President	WVPP Administrator	661-722-6301	jennifer.zellet@avc.edu
Dr. Lauren Elan Helsper	Assistant Superintendent/Vice President, People, Culture, and Talent	Employee Involvement & Training	661-722-6300 Ext 6120	lauren.elanhelsper@avc.edu
Taylor Haynes	Interim Director, Benefits & Risk Management	Risk Manager	661-722-6300 Ext 6795	taylor.haynes@avc.edu
Deputy Pine	LA County Sheriff	Campus Security	661-722-6399	depine@lasd.org

EMPLOYEE ACTIVE INVOLVEMENT

The District shall obtain the active involvement of employees and their authorized employee organization representatives in developing, implementing, reviewing and revising, and training on the Plan; including, but not limited to, involvement in identifying, evaluating, and correcting workplace violence hazards, in designing and implementing training, and in reporting workplace violence incidents.

The District may utilize the following methods in order to engage employees and authorized representatives in the development and implementation of this Plan:

- Management will work with and allow employees and authorized employee representatives to participate in:
 - Developing, implementing, reviewing, and revising, and training on the Plan.
 - Feedback will be solicited by the Safety Committee and through College Coordinating Council.
 - o Identifying, evaluating, and determining corrective measures to prevent workplace violence.
 - The Safety Committee will hold quarterly safety meetings that will include employee representatives to discuss identification of workplace violence related concerns

and/or hazards, evaluate those hazards and/or concerns, and how to correct them.

- These meetings may involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.
- Designing and implementing training.
 - Employees are encouraged to provide feedback and suggestions regarding training programs, and their suggestions are incorporated into the training materials.
 - For example, an employee might suggest a new training scenario based on a recent incident.
 - Reporting and investigating workplace violence incidents.
 - 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 approved version of the Plan will be distributed to employees and their authorized employee organization representatives.
 - 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.

COORDINATION WITH OTHER EMPLOYERS

The District will implement the following effective procedures to coordinate implementation of its plan with other employers whose employees (third-party) to ensure that those employers and employees understand their respective roles, as provided in the Plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, the District will ensure that if its employees experience a workplace violence incident that AVC will record the information in a violent incident log and shall also provide a copy of that log to the controlling employer.

COMPLIANCE

The District is committed to ensuring that all safety and health policies and procedures involving workplace security, including this Plan, are communicated clearly and understood by all employees.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, including this Plan, and for assisting in maintaining a safe and secure work environment. Failure to follow this Plan, the District's IIPP, or any other applicable directives, policies or procedures is grounds for discipline, up to and including termination. Managers and supervisors will enforce this Plan fairly and uniformly.

EMPLOYEE COMPLIANCE

In addition to methods provided in other sections of this Plan, the District's system to ensure that employees, including supervisors and managers, comply with this Plan, 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:

- Making the Plan available to employees and their authorized employee organization representatives.
 - When an employee or their authorized bargaining representative requests a copy of this Plan, the District shall provide the requester with a printed and/or electronic copy of the Plan.
 - The Plan will be provided through unobstructed access on a website, which allows an employee to review, print, and email the current version of this Plan.
- Training programs for employees, supervisors, and managers in the provisions of the District's WVPP.
 - Initial training upon implementation of the Plan.
 - Annual, review and acceptance of the Plan.
 - New hire training on the Plan.
- Recognizing employees who demonstrate safe work practices that comply and promote the WVPP in the workplace.
 - Incidents of compliance of the Plan should be memorialized in performance appraisals.
- Disciplining employees for failure to comply with the WVPP, the District's IIPP, or any other applicable directives, policies, or procedures regarding safety.
 - Incidents of non-compliance should be reported to the manager/supervisor of the employee and/or the Office of People, Culture, and Talent.
 - Provide retraining to employees whose safety performance is deficient with the WVPP.
 - Discipline employees for failure to comply with the WVPP through the AVC discipline process.
- Inspecting of the worksite periodically in accordance with the "Hazard Identification, Evaluation and Correction" section of this Plan.

COMMUNICATION

The District recognizes that to maintain a safe, healthy, and secure workplace, it must have open, two-way communication between all employees, including managers and supervisors, and other employers, on all workplace safety, health, and security issues. The Districts communication procedures are designed to encourage and facilitate a continuous flow of information between management and employees regarding any suggestions, concerns, or information relating to health, safety or security issues, without fear of reprisal and in a form that is readily understandable by all affected employees.

COMMUNICATION WITH EMPLOYEES

The District will ensure that all workplace violence policies and procedures within this Plan are clearly communicated to and understood by all employees, including any revisions to the Plan, in accordance with the "Plan Review" section of this Plan. All employees may communicate suggestions, concerns, or information regarding workplace violence either directly to their supervisor or manager or in accordance with the "Reports of Workplace Violence" and/or "Law Enforcement" sections of this Plan.

No employee will be subject to any discipline, retaliation or reprisal for reporting or communicating regarding workplace violence or any injury resulting from workplace violence.

The District's communication procedures consist of:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns.
 - Ensure that supervisors and employees can communicate effectively and in the employees' first language.
 - Provide assistance or an interpreter for supervisors and employees upon request.
- Posted or distributed workplace violence prevention information.
- 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, or other violence concerns.
 - Employees can contact emergency response at 911 or 4444 from a campus phone.
 - 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.
- Updates on the status of investigations and corrective actions are provided to employees through email and at safety meetings.
 - These updates may include information about the progress of investigation, the results of investigation, and/or any corrective actions taken.
- Sharing information with other employers to ensure a coordinated response to any incidents.
 - This may involve sending copies of training materials and incident reports to other employers.

TRAINING & INSTRUCTION

The District is committed to ensuring that all employees have effective general and job-specific training on workplace security practices that address the workplace violence risks that employees may reasonably anticipate encountering in their jobs. The District shall use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.

All training conducted in accordance with this Plan shall permit an opportunity for interactive questions and answers with a person knowledgeable about the Plan. Training may involve presentations, discussions, and/or practical exercises. Training and instruction will be provided as follows:

- When the WVPP is first established.
- To new employees, or to other employees for whom training has not previously been provided and to all employees, supervisors and managers given new job assignments for which specific workplace security training for that job assignment has not previously been provided.
- 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.
- For supervisors to familiarize themselves with the workplace violence hazards to which employees under their immediate direction and control may be exposed.

All asynchronous training will be in Keenan SafeColleges. Individual training records shall be placed in the employee's personnel file. All training records shall be kept on file for a minimum of one (1) year.

The District will shall obtain involvement from employees and their authorized employee organization representatives in providing input on and implementation of required training under the Plan. Training shall be provided on the following:

- This Plan, including the definitions and requirements as provided in this Plan; how to obtain a copy of this Plan at no cost; and how to participate in the development and implementation of this Plan.
- Reporting workplace violence incidents or concerns to the District or law enforcement without fear of reprisal, as described in the "Communications," "Reports of Workplace Violence," and "Response to Workplace Violence," sections of this Plan.
- Workplace violence hazards specific to employees' jobs, the corrective measures the District has
 implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid
 physical harm [such as how to recognize workplace violence hazards, including the risk factors
 associated with the four types of workplace violence and ways to defuse hostile or threatening
 situations.
- The Violent Incident Log (Attachment B) and how to obtain copies from the District.
- Records of workplace violence hazard identification, evaluation, and correction and how to obtain copies from the District.
- Training records and how to obtain copies from the District.
- Opportunities the District has for interactive questions and answers with a person knowledgeable about this Plan.
- Strategies to avoid/prevent workplace violence and physical harm, such as:
 - How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
 - Ways to defuse hostile or threatening situations.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.

EMPLOYEE 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 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 unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the written WVPP. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or co-employees.

REPORTS OF WORKPLACE VIOLENCE

The District requires all employees to report workplace violence (including threats of violence).

The District requires completion of a Violent Incident Report Form (Attachment A) when workplace violence occurs, except as described below. The affected employee or the person receiving the report may complete the Violent Incident Report Form.

In addition, employees may communicate suggestions, concerns or information regarding workplace violence either directly to their supervisor or manager or in accordance with this section and the "Communications" section of this Plan.

No employee will be subject to any discipline, retaliation, or reprisal for reporting a concern regarding workplace violence, workplace violence, or any injury resulting from workplace violence to the District or law enforcement. Any employee, including any supervisor or manager, who retaliates against an employee for reporting a concern regarding workplace violence, workplace violence or any injury resulting from workplace violence violence is subject to discipline, up to and including termination. Depending on the nature of the incident and the content of any report made to law enforcement or the District, the District may provide an employee with counseling or training, as warranted, regarding appropriate circumstances to make a report of workplace violence.

Nothing in this policy shall prevent an employee from accessing the employee's cellular telephone or other communication devices to seek emergency assistance, assess the safety of an emergency situation, or communicate with a person to verify their safety.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

The District will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported in person, phone call, or AVC email.
- Threats can be reported on the Violent Incident Report Form available at: https://www.avc.edu/about/administration/human-resources/forms
- Threats are reported to:
 - The employee's supervisor or manager
 - The AVC Sheriff's Office
 - The WVPP administrator or delegate
 - o Law enforcement, as appropriate
 - o The Office of People, Culture, and Talent
 - The Risk Manager

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Any employee who retaliates against a coworker for reporting an incident could be disciplined or terminated.

Any person receiving a report of workplace violence shall forward it to the Director, Benefits & Risk Management/Office of People, Culture, and Talent, who shall accept and respond to reports of workplace violence, as described in this plan. In addition to reviewing the Workplace Violence Reporting Form, the Director, Benefits & Risk Management is responsible for recording information relating to each occurrence of workplace on the Violent Incident Log (Attachment B).

All forms are processed and stored in accordance with the applicable laws and regulations relating to those forms. Even if no Violent Incident Report Form is completed, the information required by this Plan must still be recorded in the Violent Incident Log.

EMERGENCY SITUATIONS

During any emergency situation, any AVC personnel observing the situation should:

- Get to safety.
- Contact AVC Sheriff's Office at (661) 722-6399 or extension 4444 from a campus phone when it is safe to do so.
 During an on-campus emergency, individuals are encouraged to contact extension 4444 from a campus phone rather than calling 911, as that will result in a quicker response time.
- If you do not have access to an on-campus phone, call 911 when it is safe to do so.

NON-EMERGENCY SITUATIONS

Contact numbers for AVC Sheriff's Office, local law enforcement, and emergency services agencies may be available in every facility/department/operation/site. During any non-emergency situation, employees involved in a workplace violence incident must report it, as described above. The Director, Benefits & Risk Management may then report the incident to law enforcement, if warranted.

Non-emergency situations can be reported through:

- Facilities Services Work Request
- Email to fixthis@avc.edu or <u>contacthr@avc.edu</u>
- Voicemails or emails to supervisors or the Director, Benefits & Risk Management
- Phone call to AVC Sheriff's Office at (661) 722-6399 or extension 4444 from a campus phone, or by email to depine@lasd.org.

RESPONSE TO WORKPLACE VIOLENCE

In addition to the other provisions of this Plan, the District shall respond to actual or potential workplace violence, including emergencies, by the methods described below:

- No employee will be subject to any discipline, retaliation or reprisal for reporting workplace violence or any injury resulting from workplace violence to the District or law enforcement.
- Employees may always obtain help from the individuals identified in the "Responsible Persons" and "Reports of Workplace Violence" sections of this Plan.
- Any employees who report workplace violence and believe they are being subjected to discipline, retaliation or reprisal should report it to the Office of People, Culture, and Talent.

RESPONSES TO ACTUAL OR POTENTIAL WORKPLACE VIOLENCE EMERGENCIES

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

- Making this Plan available to employees and their authorized employee organization representatives.
- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following:
 - Alarm systems with sirens and lights will be used to alert employees of emergencies.
 - Screen message lock will be used in emergencies on all District on-campus devices.
 - District email and text message alerts will be used to alert employees of emergencies.
- Refer to posted evacuation maps located in each area of campus to evacuate to designated assembly areas. Exit signage is posted on exterior exits.
- Refer to Emergency Procedures posted in flip books near all department/building/facility main exits.
- Follow shelter-in-place instructions as practiced during campus drills.
- How to obtain help from staff, security personnel, or law enforcement:
 - If there is immediate danger, call for emergency assistance by dialing 4444 or 6399 from a campus phone or (661) 722-6399 from any other phone.
 - Contact local law enforcement by calling 911 or 4444 from a campus phone.
- In the event of an emergency, including a Workplace Violence Emergency, also contact an individual identified in the "Responsible Persons" section of this Plan.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION, EVALUATION, & CORRECTION

HAZARD IDENTIFICATION & EVALUATION

The District shall conduct inspections for workplace violence hazards on a periodic basis. Periodic inspections consist of identification, evaluation, and correction of workplace security hazards, unsafe conditions, and work practices, and employee reports, and concerns. Hazards identified during the inspections must be documented. Periodic inspections shall be conducted at a minimum as follows:

- When this Plan is first established.
- When the District is made aware of new or previously unrecognized workplace violence hazards.
- After each workplace violence incident.
- Whenever there is a report of workplace violence.
- Annually.

Inspections must be documented using effective means to identify, evaluate, and correct workplace violence hazards, including, checklists. The date and name of the person conducting the inspections shall be documented. Any deficiencies must be documented and reported to the WVPP Administrator or designee. Items will be addressed in a timely manner based on the severity of the hazard.

All identified hazards will be corrected, as described below in the subsection "Hazard Correction." This includes hazards identified during the inspections, by employee concerns, by Violent Incident Report Forms, by workplace violence incidents, or whenever the District is made aware of a new or previously unrecognized hazard.

Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for a minimum of five (5) years. Please see the "Records" Section of this Plan.

PERIODIC INSPECTIONS

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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 at least annually. The District performs inspections for each type of workplace violence by using the methods specified in this Plan and in District's checklists.

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

Specific Person Name/Job Title	Area/Department/Specific location	
Taylor Haynes/ Interim Director, Benefits &	Risk Management/People, Culture, & Talent/	
Risk Management	Administration Building	

Periodic inspections may include the following:

- Review of all workplace violence incidents that occurred within the previous year, regardless of whether an injury occurred.
- Review all reported workplace violence concerns, including those communicated to the District in accordance with the "Communications" and "Reports of Workplace Violence" section of this Plan.
- Identify and evaluate environmental risk factors for workplace violence at AVC, including surrounding areas, such as employee parking areas and other outdoor areas.
 - An assessment of the following specific environmental risk factors:
 - o Lack of posting of emergency telephone numbers for law enforcement, fire, and medical services.
 - Lack of employee access to a telephone with an outside line.
 - Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.

- The exterior and interior of the workplace for its attractiveness to criminals.
- Procedures for employee response during a robbery or other criminal act, including the District policy prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act.
- Employees working in locations isolated from other employees because their assignment requires them to work alone, 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.
- Poor illumination or blocked visibility of areas where possible assailants may be present.
- The need for surveillance measures, such as mirrors or cameras.
- Lack of physical barriers between employees and persons at risk of committing workplace violence.
- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or other persons with whom an employee is having a dispute.
- Lack of effective escape routes.
- Lack of a designated safe area where employees can go to in an emergency.
- Effective location and functioning of emergency buttons and alarms.
- o Obstacles and impediments to accessing alarm systems.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, including alarms or panic buttons.
- Locations within the facility where alarm systems are not operational.
- Entryways where unauthorized entrance may occur, such as doors designated for staff entrance or emergency exits.
- Procedures for reporting suspicious persons or activities.
- Storage of high-value items or currency.
- Community-based risk factors, such as information relating to local crime conditions and the local police contact information.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by visitors, customers, students, parents, or vendors.
- Employees' skill in safely handling threatening or hostile recipients.
- Availability of campus security.
- The use of work practices such as the "buddy" system for specified emergency events.
- Failure to follow the District's communication procedures and processes, in accordance with the "Communications" section of this Plan.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.

WORKPLACE VIOLENCE HAZARD CORRECTION

The District shall correct workplace hazards which threaten the security of employees in a timely manner based on the severity of the hazard. The District shall correct hazards when observed or discovered. Hazard correction must be documented using effective means, including, checklists.

The District will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary safeguards.
- The District shall inform employees regarding completed workplace violence investigations conducted pursuant to this Plan and the records of any corrective action taken, in accordance with this and the "Communications" section.

METHODS FOR HAZARD CORRECTION

The District shall use engineering and work practice controls to eliminate or minimize employee exposure to the identified hazards to the extent feasible. The District shall take measures to protect employees from imminent hazards immediately. Hazard correction will be specific to a given AVC site, facility, department, or building.

Corrective actions taken will be documented and dated on the appropriate forms and checklists. Corrective measures may include, as applicable, but shall not be limited to:

- Making the workplace unattractive to criminals by installing/maintaining lighting around and at the workplace.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Ensuring employees have access to a telephone with an outside line.
- Providing functioning systems, such as door locks, violence windows, physical barriers, emergency alarms and other restraint systems.
- Posting signs that limited cash is kept on the premises and that the premises are subject to surveillance.
- Limiting the amount of cash on hand and using time access safes for large bills.
- Ensuring sufficient numbers of staff are trained and available to prevent and immediately respond to workplace violence incidents during each shift, including the use of security guards.
- Providing line of sight or other immediate communication in all areas where members of the public may be present. This may include removal of sight barriers, provision of surveillance systems or other sight aids such as mirrors, use of a buddy system, improving illumination, or other effective means
- Configuring facility spaces so that employee access to doors and alarm systems cannot be impeded by persons or obstacles.
- Configuring facility spaces to control and limit freedom of movement within, the workplace by nonemployees, including recently discharged employees or persons with whom an employee is having a dispute.
- Ensuring adequate employee escape routes.
- Maintaining sufficient staffing, including security personnel, who can maintain order in the facility and respond to workplace violence incidents in a timely manner.
- Installing, implementing, and maintaining the use of an alarm system or other effective means by which employees can summon security and other aid to defuse or respond to an actual or potential workplace violence emergency.
- Providing training and re-training, including as provided in the "Training" section of this Plan, the District's
 emergency action procedures/reporting workplace violence concerns and incidents/awareness of the
 warning signs of potential workplace violence/handling threatening or hostile situations that may lead to
 violent acts.
- Providing procedures for a "buddy" system when needed.
- Establishing a policy for prohibited practices, including a no-weapons policy.
- Ensuring all employees report workplace violence concerns and incidents, including suspicious persons,

- activities and packages, in accordance with the "Communications" and Reports of Workplace Violence" sections of this Plan.
- Ensuring communication in accordance with the "Communications" section of this Plan.
- Ensuring an appropriate response to workplace violence concerns and incidents, and other issues such as verbal abuse or property damage are reported to the appropriate supervisor or manager and resolved in accordance with this Plan and District policy.
- Ensuring appropriate discipline for employees for workplace violence incidents, in accordance with this Plan and District's discipline procedures.

PROCEDURES FOR POST INCIDENT RESPONSE & INVESTIGATION

The District must investigate workplace violence, concerns of workplace violence and injuries from workplace violence, regardless of how they are reported or how the District becomes aware of them. In addition to the procedures discussed above in the "Communication" and "Hazard Identification, Evaluation, and Correction" sections of this Plan, the District shall promptly investigate and communicate with an employee regarding employee concerns of workplace violence and conduct investigations to prevent or respond to workplace violence.

The primary goal of investigation is the prevention of similar incidents. Management, administrative, and supervisory personnel, are responsible for ensuring investigations in their areas of responsibility are conducted.

When an employee reports workplace violence or a concern of workplace violence or when the District otherwise becomes aware of a concern of possible or actual workplace violence, the District shall conduct an investigation and respond to the workplace violence. The WVPP Administrator or other designated person shall conduct the investigation. Investigative reports prepared in accordance with this Plan shall not contain information, such as a person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity. The Violent Incident Report (Attachment A) requests details of the incident, including what happened, why it happened, what should be done to prevent it from happening again and what action has been taken to reduce or eliminate future incidents. Please also refer to the "Reports of Workplace Violence" section of this Plan.

In the event an employee is injured or sought medical treatment, supervisors shall also comply with the appropriate procedures, including completing the required entries or forms, such as OSHA Log 300 or 300A, Cal/OSHA Form 301 Injury and Illness Incident Report, and/or California Department of Industrial Relations, Division of Workers' Compensation Form DWC-1 (Workers' Compensation Claim Form). Please also refer to the "Reports of Workplace Violence" section of this Plan. Should an injury qualify as a "serious" injury as defined by Title 8 CCR Section 330, the District must report the injury to Cal/OSHA if required by Title 8 CCR Section 342.

The District offers a variety of support and resources for employees affected by workplace violence, including the Employee Assistance Program, counseling services as described in the District's benefits website, or through the use of applicable leaves for time off from work.

After a workplace incident, the WVPP administrator or their designee will implement post-incident investigation procedure what may include:

REQUIRED INVESTIGATIVE ACTIVITIES

• Informing employees how concerns will be investigated and how the employees will be informed of the results of the investigations and any corrective action, in accordance with the "Communications" and "Hazard Identification, Evaluation and Correction" sections of this Plan.

OPTIONAL INVESTIGATIVE ACTIVITIES

- 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.
- Attempt to 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, if applicable.
- Complete the Violent Incident Log (attachment B).

The requirements and procedures of this section are in addition to those described elsewhere in this Plan and those which will be taken in accordance with the District's policy regarding investigating misconduct and/or discipline. An investigation in accordance with those policies, and other applicable policies, may serve as an investigation under this Plan.

REQUIRED RESPONSE TO EMPLOYEE CONCERNS

To the extent not addressed in accordance with this section and the "Communication" and "Hazard Identification, Evaluation and Correction" sections of this Plan, the District may investigate and communicate with employees regarding their concerns using the following:

- Updating the employee on the status of the investigation into the employee's concern and any relevant corrective action.
- Providing the employee a copy of any completed workplace violence investigation conducted pursuant to this Plan relevant to the employee's concern and the records of any corrective action taken. No personally identifying information of any other employee which is the subject of the investigation will be provided to employee(s) not involved in the incident.
- The employee's first line supervisor and/or WVPP Administrator or designee may meet with the employee to discuss the concerns, the investigation, and the corrective actions to be taken.
- Sending the employee via email a summary of the employee's concern, the investigation, and actions taken in response to the employee's concern.
- Posting any completed workplace violence investigation conducted pursuant to this Plan and the records of any corrective action taken without personally identifying information.

VIOLENT INCIDENT LOG

The District shall record information regarding incidents of workplace violence in the Violent Incident Log (Attachment B). The Log shall contain the information requested in the Log about all incidents, the post-incident response and incident investigation.

The District shall prepare the Log based on information solicited from involved employees, including those who experienced the violent incident; on witness statements; and on the findings of investigations into workplace violence incidents. The Log shall not contain any elements of personally identifiable information, such as a person's name, address, electronic mail address, telephone number, or Social Security number, or other information that, alone or in combination with other publicly available information, reveals any person's identity. Workplace violence resulting in an injury requiring recording the information on the OSHA Log 300 or 300A, Cal/OSHA Form 301 Injury and Illness Incident Report, and/or California Department of Industrial Relations, Division of Workers' Compensation Form DWC-1 (Workers' Compensation Claim Form) must also be recorded on those documents, in addition to the Violent Incident Log. All OSHA forms and logs are processed and stored in accordance with the applicable laws and regulations relating to those forms.

For multiemployer worksites, the employer or employers whose employees experienced the workplace violence incident shall record the information in the Violent Incident Log and shall provide a copy of that log to the controlling employer.

PLAN REVIEW

The District shall review and revise this Plan as provided below.

The District shall review the Plan at least annually, when a deficiency is observed or becomes apparent, after a workplace violence incident, and as needed at any other time.

Review and revision, as needed, of the Plan shall consist, at a minimum, of the following:

- The Plan itself and the effectiveness of the Plan.
- Procedures used to obtain the active involvement of employees and their authorized employee organization representatives in developing, implement and reviewing the plan
- Violent Incident Log (Attachment B).

The District may conduct the review required by this section by the following methods:

- Providing the Plan and proposed revisions to the Plan to employees and their authorized employee
 organization representatives at no cost before revisions are implemented and soliciting feedback from
 employees.
- Reviewing comments left in Keenan SafeColleges training.
- Interviewing employees regarding the proposed revisions and/or violence at the District.
- Conducting Safety Committee meetings regarding the Plan and reviewing suggestions.
- Conducting periodic employee meetings.
- Distributing a survey.

The District shall communicate any revisions to the Plan to all employees, in accordance with the "Communications" section of this Plan.

RECORDKEEPING

The District shall keep and maintain records as required by this Plan.

The District shall create training records, which shall include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions, and maintain training records for a minimum of one (1) year in Keenan SafeColleges.

The District shall create and maintain the following records for a minimum of five (5) years:

- Hazard identification, evaluation and correction.
- Violent Incident Log.
- Records of workplace violent incident investigations conducted pursuant to this Plan.
 - All 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 <u>LC section 6401.9(f)</u>, 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 authorized representatives, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent Incident Log.
 - Any employee personally identifiable information shall not be released, except as authorized by law. All records required by this Plan shall be made available to Cal-OSHA upon request and as required by law.

EMPLOYER REPORTING RESPONSIBILITIES

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

ATTACHMENT A: ANTELOPE VALLEY COMMUNITY COLLEGE DISTRICT VIOLENT INCIDENT REPORT FORM

Employee Name:

Name/Title/Contact Information of Person Completing Form: _____

Date/Time	Location/ Department	Incident Description (Please include as much detail as possible. Include additional sheet if necessary.)	Violence Committed By? ¹

Type of Incident: (check all that apply)

Physical attack without a weapon (e.g. biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting)
 Attack with weapon (e.g. gun, knife, other object)
 Threat of physical force or use of weapon or other object
 Sexual assault or threat (rape or attempted rape, physical display, or unwanted verbal or physical sexual contact)
 Verbal Harassment
 Animal Attack
 Other

Incident Location Specifics: (check all that apply)

□ Office □ Classroom □ Hallway □ Restroom/Bathroom □ Parking Lot □ Other Area Outside Building □ Personal Residence □ Break Room □ Cafeteria □ Other: _____

Incident Specifics: (check all that apply)

□ Victim Performing Usual Job Duties □ Poor Lighting □ Rushed □ Working During Low Staffing Level □ High Crime Area □ Isolated/Alone □ Unable to Get Help/Assistance □ Working in Community Setting □ Working in Unfamiliar/New Location

Consequence Specifics: (check all that apply)

□ Medical Treatment Provided □ Assistance Provided to Conclude Incident (detail in Incident Description)
Security Contacted Law Enforcement Contacted Lost Time of Work Hours:
Actions Requested to Protect from Continuing Threat (if any):

PLEASE NOTE: If the alleged conduct may fall within the Title IX definition of Sexual Harassment, including, but not limited to, Sexual Assault, Domestic Violence, Dating Violence, or Stalking, the District's Title IX Coordinator will reach out to the reporting party to gather more information and provide resources. If the alleged conduct is determined to fall within Title IX, the Coordinator will conduct an intake meeting and offer supportive measures.

¹ The perpetrator will be classified as: (1) client or customer; (2) family or friend of a client or customer; (3) stranger with criminal intent; (4) co-worker, supervisor or manager of victim, (5) partner or spouse, parent or relative of victim, or (6) other perpetrator.

ATTACHMENT B: VIOLENT INCIDENT LOG

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involve will be omitted from this log, such as:

- Names
- Addresses physical and electronic
- Telephone numbers
- Social security number

Day, Month, Year the incident occurred: _____

Time (or approximate time) that the incident occurred: ______a.m./p.m.

Location(s) of Incident	Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4)

Check which of the following describes the type(s) of incident, and explain in detail:

Note: It's important to understand that "Workplace Violence Type" and "Type of Incident" have separate requirements. For this part of the log, "Type of Incident" specifically refers to the nature or characteristics of the incident being logged. It does not refer to the type of workplace violence.

- 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.

Provide a detailed description of the incident and any additional information on the violence incident type and what it included. Continue on separate sheet of paper if necessary.

Workplace violence committed by (for confidentiality, only include the 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):

Circumstances at the time of the incident (what was happening 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.):

Where the incident occurred (eg. the workplace, parking lot or other area outside of the workplace):

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.

Were there any injuries? Yes or No. Please provide description of the injuries:

Were emergency medical responders other than law enforcement contacted, such as a Fire Department, Paramedics, On-site First-aid certified personnel? Yes or No. If yes, explain below:

Did the severity of the injuries require reporting to Cal/OSHA? If along with the name of the Cal/OSHA representative contacted.	yes, document the date and time this was done,
A copy of this violent incident log needs to be provided to the em whom.	ployer. Indicate when it was provided and to
This violent incident log was completed by:	
Name/Job Title:	Date:

Signature: