

Santa Monica Community College District

Workplace Violence Prevention Program

Workplace Violence Prevention Plan

What is workplace violence?

Workplace violence includes threats or acts of physical violence at work and is a serious concern for employers and workers. On September 30, 2023, Governor Newsom signed Senate Bill (SB) 553 which requires employers to develop and implement a workplace violence prevention plan (WVPP). SB 553 directs Cal/OSHA with creating a set of standards that California employers will be required to follow upon formal adoption and implementation, which is supposed to happen no later than December 31, 2026.

Purpose

Santa Monica Community College District (SMCCD or District) is committed to providing a work and learning environment that is free of violence and the threat of violence. Violence or a credible threat of violence from any individual carried out in the workplace is prohibited by <u>Board Policy</u> (BP) 3510 and AR 3510 *Workplace Violence*.

SB 553 mandates that employers establish a comprehensive Workplace Violence Prevention Plan (WVPP). The purpose of the WVPP is to ensure that the District provides employees with a place to conduct business that is free of threats, intimidation, harassment, and acts of violence. Below are the components required for the implementation of the Workplace Violence Prevention Plan:

- Accountability: The plan will clearly define the individuals responsible for implementing and maintaining the Workplace Violence Prevention Plan.
- Employee Engagement: Active employee participation is encouraged in developing, implementing, and reviewing the plan. Involvement is vital in identifying and addressing workplace violence risks, shaping training programs, and reporting incidents.
- Coordination: Procedures will be outlined for coordinating the execution of the plan among employees in the same department or facility.
- Emergency Response: Procedures will be established for promptly seeking assistance from law enforcement during all work shifts. Importantly, the plan will strictly prohibit any form of retaliation against employees seeking help.
- Incident Response: The plan will detail procedures for addressing workplace violence incidents and will strictly prohibit any form of retaliation against employees who report such incidents.
- Compliance: Stringent procedures will ensure adherence to the Workplace Violence Prevention Plan.
- Communication: Clear communication channels will be established to keep everyone informed about workplace violence matters.
- Training: Comprehensive training programs will be provided based on the Workplace Violence Prevention Plan.
- Risk Assessment: Rigorous risk assessment procedures will be in place to identify and evaluate potential workplace violence factors.
- Hazard Correction: If any hazards are identified, prompt corrective action will be taken.
- Post-Incident: Procedures will guide response and investigation following workplace violence incidents.

This development underscores the importance of workplace safety for all employers. SB 553 and the Workplace Violence Prevention Plan are designed to enhance workplace security and safeguard all employees.

Scope & Responsibility

The scope of the WVPP applies to all SMCCD employees. The development of the WVPP was managed by a core team that will include Human Resources, Risk Management and the Santa Monica College Police Department. The WVPP incorporates stakeholder input through the active involvement of employees through districtwide and college shared governance committees.

All supervisors are responsible for implementing the WVPP in their work areas and ensuring compliance with its provisions, and for answering employee questions about the WVPP. Supervisors will enforce the rules fairly and uniformly.

All District employees are expected to act professionally, courteously, and responsibly at all times. Employees shall follow all workplace security directives and procedures and assist in maintaining a safe work environment. It is the responsibility of every employee to immediately report all acts of workplace violence to their supervisor without fear of reprisal.

RESPONSIBILITIES

The effectiveness of the Workplace Violence Prevention Plan (WVPP) hinges upon clear and accountable implementation. To ensure the seamless execution of this plan, it is imperative to explicitly identify the individuals entrusted with the responsibility of overseeing and implementing the WVPP. The following sections delineate the roles and responsibilities of these key personnel:

1. **Core Team:** Below is a list of the core team responsible for implementing the WVPP and their corresponding responsibilities in maintaining the program:

Job title / Committee	WVPP Responsibility	Contact Information
Core Team – Director of Safety & Risk Management, Chief of Police, Vice President of Human Resources; Campus Counsel; Dean of Health and Wellbeing	Overall responsibility for plan development. Member of Behavior Intervention Team.	
Police	Responsible for emergency response, security hazard identification, and workplace incident investigation. Member of Behavior Intervention Team.	Police (310)434-4300 police@smc.edu

Human Resources	Responsible for workplace incident investigation; work with Campus Counsel on seeking workplace violence restraining orders in accordance with Code of Civil Procedure Section 527.8 as appropriate; determine employee disciplinary actions. Member of Behavior Intervention Team.	Office of Human Resources (310)434-4415 humanresources@smc.edu
Safety & Risk Management	Responsible for workplace incident investigation, responsible for injury investigation and worker's compensation management, and security hazard identification. Member of Behavior Intervention Team.	Office of Safety & Risk Management (310)434-4318 riskmanagement@smc.edu

2. Senior Management:

Senior Management, including the Vice President of Human Resources, shall hold ultimate responsibility for the overall implementation and success of the WVPP. Their roles encompass:

- Providing Leadership: Leading by example and fostering a culture of workplace safety.
- Allocating Resources: Ensuring adequate resources, including funding, personnel, and training, to support the WVPP.
- Ensure that all workplace violence policies and administrative regulations within this written plan are clearly communicated and understood by all employees.
- Establishing Policies: Formulating and updating policies and administrative regulations that align with the WVPP's objectives.
- Reviewing and Approving Plans: Reviewing and approving departmental and facility-specific WVPPs.

3. WVPP Coordinator:

The WVPP Coordinators, designated as Human Resources, Safety & Risk Management, and Police are directly responsible for the day-to-day oversight and coordination of the WVPP. Their duties include:

- Plan Development: Collaborating with relevant stakeholders to develop and maintain the WVPP.
- Employee Training: Organizing and facilitating WVPP training for all employees.
- Incident Reporting: Managing the reporting and investigation of workplace violence incidents.
- Compliance Assurance: Ensuring compliance with all WVPP requirements and regulations.
 Establishing Policies: Formulating and updating policies and administrative regulations that align with the WVPP's objectives.

4. Departmental Supervisors/Managers:

Supervisors/Managers within each department or facility, as identified by their management and or administrator job classification, have a crucial role in implementing the WVPP at the ground level. Their responsibilities include:

- Managers: They will be responsible for conducting a hazard assessment within all of their department locations for workplace violence deficiencies through the online survey form found at: https://survey.alchemer.com/s3/7871459/Workplace-Violence-Risk-Assessment
- Employee Education: Ensuring that employees under their supervision are aware of the WVPP and are trained accordingly.
- Incident Reporting: Promptly reporting any workplace violence incidents to the WVPP Coordinator.
- Hazards Mitigation: Taking immediate corrective actions to address any identified hazards or risks.

5. All Employees:

Every employee within SMCCD plays a vital part in the success of the WVPP. Their responsibilities encompass:

- Compliance: Adhering to the WVPP guidelines, policies, and regulations .
- Reporting: Reporting any observed or experienced workplace violence incidents promptly.
- Active Participation: Actively participating in training, hazard identification, and incident prevention efforts.

The clear identification of these responsible individuals ensures that the WVPP remains a dynamic and effective tool for preventing workplace violence. Through the collective efforts of these designated parties, we are committed to fostering a safe and secure work environment for all employees.

Procedures to Obtain Active Involvement of Employees

Our commitment to a safe and secure work environment hinges upon the active participation of all employees and authorized employee representatives in the development and implementation of our Workplace Violence Prevention Plan (WVPP). This section outlines the procedures and mechanisms in place to ensure employee's meaningful involvement in various aspects of the WVPP:

1. Identification and Evaluation of Hazards:

The success of our WVPP begins with the identification and evaluation of potential workplace violence hazards. We encourage and facilitate the active involvement of employees and authorized employee representatives in this process by:

- Open Communication: Providing channels for employees to communicate their concerns and observations regarding potential hazards.
- Reporting Mechanisms: Establishing clear and accessible reporting procedures for employees to notify relevant personnel of workplace violence concerns.

2. Design and Implementation of Training:

Effective training is a cornerstone of our WVPP. To ensure that training programs are relevant and beneficial, employees and authorized employee representatives are actively involved by:

 Input and Feedback: Encouraging employees to provide input and feedback on training content and methods.

3. Reporting and Investigating Incidents:

Prompt reporting and thorough investigation of workplace violence incidents are essential. Employees and authorized employee representatives are integral to this process by:

- Incident Reporting: Encouraging employees to report all incidents of workplace violence promptly, ensuring confidentiality and non-retaliation.
- Investigation Participation: Allowing employees or their authorized representatives to participate in incident investigations, providing valuable insights.

4. WVPP Review and Refinement:

Our WVPP is a dynamic document that evolves with changing circumstances. Employees and authorized employee representatives are actively engaged in this process by:

- Regular Reviews: Conducting periodic reviews of the WVPP with input from employees and authorized employee representatives.
- Recommendations: Encouraging employees and representatives to make recommendations for improvements and revisions.

5. Representation and Committees:

To facilitate employee participation, we may establish representative committees or designate specific employee representatives. These representatives will play a pivotal role in advocating for employee interests and collaborating with management to enhance workplace safety.

In summary, the active involvement of employees and authorized employee representatives is not just encouraged, it is integral to the success of our WVPP. By fostering a culture of open communication, collaboration, and shared responsibility, we aim to create a workplace where everyone actively contributes to the prevention of workplace violence and the promotion of a secure and harmonious environment.

Definitions

Workplace violence encompasses various forms of behavior, including but not limited to the following:

- 1. It involves the threat or use of physical force against an employee, and this behavior can result in, or have a high likelihood of resulting in injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- 2. Workplace violence also encompasses incidents that entail the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, even if the employee does not sustain an injury as a result.
- 3. Not every workplace violence incident is an emergency. An emergency exists if the workplace violence is continuing or might continue without adequate response (e.g., active shooter, credible bomb threat).
- 4. Workplace violence can be categorized into four distinct types:
 - a. Type 1 violence is characterized by workplace violence committed by a person who has no legitimate business at the worksite. This category includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
 - b. Type 2 violence refers to workplace violence directed at employees by students, vendors, contractors, or visitors.

- c. Type 3 violence involves workplace violence against an employee by a present or former employee, supervisor, or manager.
- d. Type 4 violence pertains to 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.

A combination of one or more types of workplace violence may exist in the workplace. It is important to note that workplace violence does not encompass lawful acts of self-defense or defense of others.

Ensuring Compliance with the Workplace Violence Prevention Plan

Our commitment to a safe and secure work environment hinges on the consistent and uniform compliance of all supervisory and nonsupervisory employees with our Workplace Violence Prevention Plan (WVPP). To ensure that workers comply with the rules and maintain a secure work environment, SMCCD will implement at a minimum:

1. Education and Training:

- a. Mandatory Training: All employees, including faculty, staff and administrators, will receive mandatory training on the WVPP. This training will cover the plan's provisions, objectives, and the specific roles and responsibilities of employees in preventing and responding to workplace violence.
- b. Periodic Refresher Training: To ensure ongoing compliance and awareness, periodic refresher training sessions will be conducted for all employees.

2. Supervision and Oversight:

- a. Supervisory Responsibility: Supervisors/managers play a pivotal role in ensuring compliance with the WVPP among their respective teams. They are responsible for overseeing and enforcing the plan's policies and procedures.
- b. Consistency Checks: Supervisors/managers will conduct regular checks to ensure that employees under their supervision are consistently adhering to the WVPP quidelines.

3. Reporting and Documentation:

- a. Incident Reporting: Any employee who is the victim of any violent threatening or harassing conduct, any witness to such conduct, or anyone receiving a report of such conduct, whether the perpetrator is a District employee or a non-employee, shall immediately report the incident to their supervisor/manager and to the Behavioral Intervention Team (BIT) Group Portal and shall do so without fear of reprisal.
- b. Documentation of Incidents: Incidents, investigations, and actions taken to address workplace violence will be thoroughly documented and maintained as part of our commitment to compliance.
- 4. **Communication:** Communication is an important aspect of ensuring the success of the WVPP. We encourage open and transparent communication channels between employees and management. Any concerns, suggestions, or questions regarding the WVPP are welcomed and will be addressed accordingly and promptly.
- 5. **Accountability and Consequences:** All employees are accountable for their actions in relation to the WVPP. Failure to comply with the plan's provisions may result in disciplinary actions, as deemed appropriate and in accordance with the District's policies, Ed Codes and bargaining agreements.

6. **Continuous Improvement and Feedback:** We encourage feedback from employees regarding the WVPP's effectiveness and any potential areas for improvement. This feedback will be considered for ongoing enhancements to the plan.

Our commitment to ensuring compliance with the WVPP is unwavering. By providing comprehensive education and training, establishing supervisory oversight, fostering open communication, and holding individuals accountable for their actions, we aim to create a workplace where all employees understand and adhere to the principles of our Workplace Violence Prevention Plan.

Communication with Employees Regarding Workplace Violence Matters

Effective communication is a cornerstone of our commitment to maintaining a safe and secure work environment. Our Workplace Violence Prevention Plan (WVPP) is founded on clear procedures to ensure employees are informed about workplace violence matters, including reporting incidents or concerns and the subsequent investigation process. This section outlines our communication procedures in compliance with regulatory requirements:

1. Reporting Workplace Violence Concerns:

- a. Open Reporting Channels: We maintain open and accessible reporting channels that enable employees to report violent incidents, threats, or other workplace violence concerns without fear of reprisal. Employees can make reports to their immediate supervisor, manager, the designated WVPP Coordinator, or through established reporting mechanisms.
- b. Incident report forms for incident communication are available on through the District's incident reporting Behavioral Intervention Team portal found at this link: https://cm.maxient.com/reportingform.php?SantaMonicaCollege&layout_id=10
- c. Confidential Reporting: We respect the confidentiality of employees who choose to make reports and will take steps to protect their identity to the extent permitted by law.

2. Investigation Procedures:

- a. Immediate Action: Upon receipt of a report, it will be assigned to the appropriate department who will promptly initiate an appropriate response, including assessing the immediate safety of those involved. Should it be warranted Campus Police will be called immediately to deal with the threat.
- b. Formal Investigation: When necessary, a formal investigation will be conducted by trained personnel to gather all relevant information, interview witnesses, and assess the situation thoroughly. The investigation will be thorough, impartial and free from bias.
- c. Confidentiality: We will maintain the confidentiality of all parties involved to the fullest extent possible during the investigation process.

3. Results and Corrective Actions:

a. Communication of Results: Once the investigation is complete, employees who made reports will be informed of the results of the investigation to the extent permitted by law. If the investigation involved a responding party they will be informed of the results of the investigation to the extent permitted by law This communication will include an overview of the findings and any corrective actions that will be taken. Corrective Actions: When appropriate, corrective actions will be implemented to address workplace violence concerns. These actions may include disciplinary measures against perpetrators or adjustments to our workplace violence prevention strategies.

4. Training and Awareness:

- a. Training Programs: We provide training to all employees to ensure they are aware of the District's reporting procedures and the investigation process. This training is designed to empower employees to report concerns timely and confidently.
- b. Awareness Campaigns: Periodic awareness campaigns and reminders will be disseminated to keep employees informed about workplace violence matters, the reporting process, and the organization's commitment to a safe workplace.

5. Ongoing Communication:

- a. Continuous Feedback: We encourage employees to provide feedback on our communication and reporting procedures. Suggestions for improvements are welcomed and will be considered for ongoing enhancements to the WVPP.
- b. Our commitment to transparent and effective communication is unwavering. By providing clear reporting procedures, ensuring confidentiality, communicating investigation results, and taking appropriate corrective actions, we aim to create a workplace where employees feel safe and empowered to report workplace violence concerns, knowing their concerns will be taken seriously and addressed promptly.

Responding to Workplace Violence Emergencies

The safety and well-being of our employees are paramount. The Workplace Violence Prevention Plan (WVPP) includes comprehensive procedures to respond to actual or potential workplace violence emergencies, ensuring the swift and appropriate action needed to protect our workforce. This section outlines our procedures in accordance with regulatory requirements:

1. Alerting Employees:

- a. Alert System: We have implemented an effective alert system that enables the rapid notification of all employees in the event of a workplace violence emergency. This system includes audible alerts, visual alerts, and digital notifications, ensuring that employees are promptly informed of the presence, location, and nature of the emergency.
- b. Training and Familiarization: All employees will receive training on the use of the alert system, including how to recognize and respond to alerts.

2. Evacuation and Sheltering Plans:

- a. Evacuation Plans: We have developed comprehensive evacuation plans that are tailored to the specific characteristics of our worksite. These plans include designated evacuation routes, assembly areas, and procedures for employees to follow during an evacuation.
- b. Sheltering Plans: In situations where evacuation may not be feasible or safe, we have established sheltering plans that provide employees with guidance on taking cover and seeking safety within the worksite.

3. Obtaining Help and Assistance:

a. Staff Response: We have designated trained personnel who are responsible for responding to workplace violence emergencies. Campus Police and members of the Emergency Operations team are equipped with the knowledge and skills necessary to manage and mitigate emergency situations.

- b. Law Enforcement: In the event of a severe workplace violence emergency that cannot be managed internally by Campus Police, we have established procedures to obtain assistance from local law enforcement agencies through established memorandums of understanding. This includes clear communication channels and designated points of contact for coordinating with law enforcement.
- c. The following are steps that the supervisor/manager should take when responding to and/or dealing with active violent situation:
 - i. Call Campus Police emergency line (310)434-4300 or Dial 9-1-1 from your campus phone to notify the police of the incident.
 - ii. Provide first aid, if needed (and if qualified).
 - iii. Immediately notify Human Resources, Risk Management and Health Services.
 - iv. Create the initial Workplace Violence Report through the Behaviorial Intervention Team portal within 24 hours from time of incident. https://cm.maxient.com/reportingform.php?SantaMonicaCollege&layout_id=1
 - v. If there are injuries, Campus Police and/or Human Resources will contact critical departments such as senior staff.
 - vi. As appropriate, provide employee in need of mental health counseling a referral to the EASE Employee Assistance Service for Education Program, 1-800-882-1341 at SMC EASE Program Santa Monica College
 - vii. Working with Human Resources, initiate appropriate disciplinary action, which may include suspension, and/or dismissal and appropriate legal action.

4. Employee Training:

- a. Emergency Response Training: All employees will receive training on how to respond to workplace violence emergencies. This training will cover the use of the alert system, evacuation procedures, sheltering protocols, and how to obtain help from designated staff, security personnel, and law enforcement.
- b. Drills and Exercises: Campus Police and Risk Management will conduct regular emergency response drills and exercises to ensure that employees are familiar with the procedures and can respond effectively in high-stress situations.

By providing effective means of alerting employees, clear evacuation and sheltering plans, and access to trained staff, security, and Campus Police when needed, we aim to create a workplace where employees feel confident and empowered to respond to workplace violence emergencies with the utmost safety and professionalism.

Identifying and Evaluating Workplace Violence Hazards

The safety and well-being of our employees are paramount. The Workplace Violence Prevention Plan (WVPP) is built on procedures designed to identify and evaluate workplace violence hazards effectively. This section outlines our comprehensive approach, which includes scheduled inspections, employee reporting, and hazard assessment in accordance with regulatory requirements:

Hazard assessment procedures include, but are not limited to, the following:

1. Scheduled Periodic Inspections:

- a. Initial Inspection: When our WVPP is first established, a comprehensive inspection of our workplace will be conducted to identify potential workplace violence hazards. This initial assessment will serve as the foundation for our ongoing hazard prevention efforts. Supervisors/Managers will be responsible for conducting a hazard assessment within all of their department locations for workplace violence deficiencies through the online survey form found at https://survey.alchemer.com/s3/7871459/Workplace-Violence-Risk-Assessment
- b. Periodic Inspections: Scheduled inspections will be conducted at regular intervals to ensure that workplace violence hazards are continuously monitored and addressed. Inspections shall be conducted when the plan is first established, after each workplace violence incident, whenever the employer is made aware of a new or previously unrecognized hazard, and after changes occur within the workplace that impact the threat level or hazard.

2. Post-Incident Inspections:

a. After Each Incident: Following each workplace violence incident, regardless of its severity, an immediate post-incident inspection will be conducted to assess the factors that contributed to the incident. This includes examining both physical conditions and work practices.

3. Employee Reports and Concerns:

- a. Reporting Channels: Employees are encouraged to report any workplace violence concerns or hazards they observe promptly. Reporting channels include supervisors/managers, the designated WVPP Coordinators, or established reporting mechanisms. Reporting can be completed through the District's incident reporting Behavioral Intervention Team portal found at this link: https://cm.maxient.com/reportingform.php?SantaMonicaCollege&layout_id=10
- 4. **Hazard Assessment:** Hazard Identification: Identified hazards will be thoroughly assessed to determine the severity and potential impact on employee safety. This assessment will include the classification of hazards and their potential consequences.
- 5. **Corrective Actions and Timely Mitigation**: Once hazards are identified and evaluated, corrective actions will be implemented promptly to eliminate or minimize the identified risks. These actions may include changes to physical facilities, work practices, or policies. SMCCD will implement the following effective procedures to correct workplace hazards that are identified:
 - a. If an imminent hazard exists that cannot be immediately abated without endangering worker(s) and/or property, all exposed workers will be removed from the situation except those necessary to correct the existing condition.
 - b. If multiple hazards that pose a risk for violence in the workplace are identified, they will be prioritized based on the severity of the hazards (with the higher risk situations having higher priority).
 - c. All implemented corrective actions will be documented and dated.
 - d. Workers necessary to correct the hazardous condition, such as Campus Police, will be provided with the necessary protection.
- 6. **Documentation:** Detailed records of inspections, hazard assessments, and corrective actions will be maintained in Maxient, the case management system, and made accessible for compliance monitoring and audit purposes.

By following these procedures for identifying and evaluating workplace violence hazards, we are committed to fostering a safe and secure work environment. These efforts aim to prevent potential incidents and continuously improve our workplace violence prevention measures.

Post Incident Response and Investigation

The Behavioral Intervention Team is designated as responsible for implementing the requirements for the administrative investigation and corrective action to remedy any incidents or alleged incidents of workplace violence. Human Resources shall ensure a thorough investigation is conducted and that appropriate action is taken should the allegation be substantiated.

Prompt and effective post-incident response and investigation procedures are critical components of our commitment to maintaining a safe workplace. Employees at SMCCD who may be responders to incidents to conduct a post incident response and investigation include: Campus Police Officers, Title IX Coordinator, Human Resources managers, Health Services, and Risk Manager.

This section outlines our procedures for responding to and investigating workplace violence incidents:

1. **Initial Assessment:** A preliminary assessment of the incident will be conducted to gather essential information and determine the appropriate course of action for further investigation.

2. Formal Investigation:

- a. Investigation Team: Trained personnel will be assigned to conduct a formal investigation into the incident. The Behavioral Intervention Team is designated as responsible for implementing the requirements for the administrative investigation and corrective action to remedy any incidents or alleged incidents of workplace violence. Human Resources shall ensure a thorough investigation is conducted and that appropriate action is taken should the allegation be substantiated.
- b. Evidence Gathering: The investigation will involve the collection of evidence, including witness interviews, photographic documentation, and any relevant physical evidence. After a workplace incident is reported, the designated Human Resources representative will coordinate the following post-incident procedures:
 - i. Visit the scene of an incident as soon as safe and practicable.
 - ii. Interview involved parties, such as employees, other witnesses, law enforcement, and/or security personnel.
 - iii. Review security footage, if applicable.
 - iv. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
 - v. Determine the cause of the incident.

3. Communication:

- a. Reporting to Employees: Employees who have reported or witnessed the workplace violence incident will be informed of the status and progress of the investigation to the extent permitted by law.
- b. Reporting to Law Enforcement: In cases where the incident may involve criminal activity, Campus Police will be notified as required by law. Cooperation with Campus Police or local law enforcement agencies will be facilitated.

4. Findings and Corrective Actions:

- Investigation Report: Upon the completion of the investigation, a comprehensive report will be generated, detailing the findings, conclusions, and if substantiated recommendations for corrective actions.
- b. Corrective Actions: Based on the investigation findings, appropriate corrective actions will be implemented promptly to address the incident's causes and prevent recurrence. These actions may include disciplinary measures, policy changes, or security enhancements.

- Coordinate support and resources to the affected employees. These resources could include referrals to counseling service, workers comp, information about the employee assistance program (EASE), and time off work if necessary.
- d. The BIT shall consider whether to seek a workplace violence restraining order in accordance with Code of Civil Procedure Section 527.
- e. Violence or the threat of violence against or by any employee of the District or any other person is unacceptable. Should a non-employee on District property demonstrate or threaten violent behavior, they may be subject to criminal prosecution. Should an employee demonstrate or threaten violent behavior at anytime, anywhere on District premises, they may be subject to disciplinary action, and/or criminal prosecution.

5. **Documentation and Records:**

- a. Records Maintenance: All records related to post-incident response and investigation, including investigation reports, witness statements, and corrective action documentation, will be maintained and made accessible for compliance monitoring and audit purposes.
- b. BIT will record the findings and ensure corrective actions are taken.
- c. BIT will obtain any reports completed by law enforcement.
- d. BIT will complete a workplace violence incident written investigation report. 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.

6. Continuous Improvement:

- a. Feedback Mechanisms: We encourage employees to provide feedback on the post-incident response and investigation process. Suggestions for improvements are welcomed and will be considered for ongoing enhancements.
- b. Our commitment to thorough and effective post-incident response and investigation procedures is unwavering. By following these procedures, we aim to provide support to those affected by workplace violence incidents, ensure accountability, and continuously improve our workplace violence prevention efforts.

Training Frequency

The safety and well-being of our employees are of paramount importance. To ensure that all employees are equipped to recognize, prevent, and respond to workplace violence incidents effectively, we have established a comprehensive training program.

SMCCD shall provide effective training to employees that addresses the workplace violence risks that the employees are reasonably anticipated to encounter. Human Resources shall be responsible for scheduling workshops on workplace violence, conflict resolution, and related topics. Training and instruction will be provided as follows:

- 1. All employees shall be provided with initial training when the WVPP is first established.
- 2. When an employee is newly hired or newly assigned to perform duties for which training was not previously provided.
- 3. Whenever new workplace security concerns are introduced to the workplace and represent a new hazard.

TRAINING TOPICS

Initial training shall address the workplace violence hazards identified in the facility, unit, service, or operation, and the corrective measures the employer has implemented. Training topics shall include the following:

- 1. An explanation of the employer's workplace violence prevention plan;
- 2. Definitions and requirements outlined in this section;
- 3. The employer's hazard identification and evaluation procedures;
- 4. General and personal safety measures the employer has implemented;
- 5. Procedures for reporting workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal;
- 6. How the employer will address workplace violence incidents;
- 7. How the employee can participate in reviewing and revising the Plan;
- 8. How to recognize the potential for violence, factors contributing to the escalation of violence and how to counteract them, and when and how to seek assistance to prevent or respond to violence;
- 9. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors;
- 10. Ways to defuse hostile or threatening situations. Strategies to avoid physical harm;
- 11. How to recognize alerts, alarms, or other warnings about emergency conditions such as mass casualty threats and how to use identified escape routes or locations for sheltering, as applicable;
- 12. Measures to summon others for assistance;
- 13. Worker routes of escape;
- 14. The role of Campus Police;
- 15. How to report violent incidents to law enforcement;
- 16. Any resources available to employees for coping with incidents of violence, including, but not limited to, critical incident stress debriefing or employee assistance programs;
- 17. An explanation of the Violent Incident Log, and instructions on how to obtain copies of records;
- 18. An opportunity for interactive questions and answers with a person knowledgeable about the employer's workplace violence prevention plan;

TRAINING FOR EMPLOYEES ASSIGNED TO RESPOND INCLUDE MEMBERS OF SWORN LAW ENFORCEMENT

Employees assigned to respond to alarms or other notifications of violent incidents or whose assignments involve confronting or controlling persons exhibiting aggressive or violent behavior shall be provided training in accordance with and in compliance with the California Peace Officer Standards and Training (POST).

Incident Log & Recordkeeping

RECORDING WORKPLACE VIOLENCE INCIDENTS IN THE VIOLENT INCIDENT LOG (see Appendix A)

Our commitment to workplace safety includes thorough documentation of workplace violence incidents. The Behavioral Intervention Team shall manage the information in a violent incident log (Log) about every

incident. Information about each incident shall be based on information solicited from the employees who experienced the workplace violence.

This section outlines our procedures for recording and maintaining the Log, as required by regulatory standards:

- 1. **Incident Documentation:** The employer shall maintain the Log that records information for every workplace violence incident, regardless of its nature or severity.
- 2. **Information Sources:** Information recorded in the Log will be based on input from employees who experienced the workplace violence incident, as well as witness statements and findings from investigations.
- 3. **Protecting Personal Identifying Information:** To protect the privacy of individuals involved in a violent incident, personal identifying information that could reveal a person's identity, such as their name, address, electronic mail address, telephone number, or social security number, shall be omitted from the log.
- 4. **Periodic Review:** Review Process: The Log shall be reviewed during the periodic reviews of the WVPP, as required in subparagraph (L) of paragraph (2) of subdivision (c).
- 5. **Log Information:** The information recorded in the Log shall include the following details for each incident:
 - a. The date, time, specific location, and department of the incident;.
 - b. The workplace violence type or types, as described in clause (iii) of subparagraph (B) of paragraph (6) of subdivision (a), involved in the incident.
 - c. A detailed description of the incident.
 - d. A classification of who committed the violence, including whether the perpetrator was an employee/student/visitor, family/friend of an employee/student/visitor, stranger with criminal intent, coworker, supervisor/manager, partner/spouse, parent/relative, or other perpetrator;
 - e. 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.
 - f. A classification of where the incident occurred, including whether it was in a classroom, office, conference room, laboratory, patient or therapy room, hallway, waiting room, restroom, locker room, parking lot or other area outside the building, break room, cafeteria, or other area;
 - g. 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.
 - ii. Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - iii. Threat of physical force or threat of the use of a weapon or other object.

- iv. Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- v. Animal attack.
- vi. Other.
- h. Consequences of the incident, including:
 - i. Whether medical treatment was provided to the employee;
 - ii. Who, if anyone, provided necessary assistance to conclude the incident;
 - iii. Whether security was contacted and whether law enforcement was contacted;
 - iv. Amount of lost time from work, if any;
 - v. Actions taken to protect employees from a continuing threat, if any.
 - vi. Information about the person completing the Log including their name, job title, phone number, email address, and the date completed.

CalOSHA RECORDKEEPING

The Cal/OSHA's recordkeeping requirements for WVPP shall be followed, including:

- 1. Maintain records of workplace violence hazard identification, evaluation, and correction for a minimum of five (5) years.
- 2. Maintain training records for a minimum of one (1) year and 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.
- 3. Maintain violent incident logs for a minimum of five (5) years.
- 4. Maintain records of workplace violence incident investigations conducted for a minimum of five (5) years. These records shall not contain "medical information" as defined by Civil Code Section 56.05(j).
- 5. All records of workplace violence hazard indicated above, shall be made available to Cal/OSHA upon request for examination and copying.
- 6. Records of workplace violence hazard identification, evaluation, and correction, employee training, and violent incident logs 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.

Access, Review, & Resources

EMPLOYEE ACCESS TO THE WVPP

The Santa Monica Community College District (SMCCD) Workplace Violence Prevention Program (WVPP) shall be accessible to all employees via the District's Risk Management Injury & Illness Prevention Plan website at this link:

https://www.smc.edu/administration/business-services/risk-management/injury-illness-prevention.php

PLAN REVIEW

The BIT shall establish and implement a system to review the effectiveness of the WVPP for the overall facility or operation periodically, in conjunction with employees and their representatives regarding the employees' respective work areas, services, and operations.

Problems found during the review shall be corrected in accordance with Cal/OSHA regulations. The review shall include evaluation of the following:

- 1. Staffing, including staffing patterns and student classification systems that contribute to, or are insufficient to address, the risk of violence;
- 2. Sufficiency of security systems, including alarms, emergency response, and security personnel availability;
- 3. Job design, equipment, and facilities;
- 4. The WVPP, in accordance with Section 3203(a)(4)(B) and (C), as it applies to units within a facility, the facility as a whole, or the particular operation, shall also be reviewed for the unit, facility or operation, and updated whenever necessary as follows:
- 5. To reflect new or modified tasks and procedures which may affect how the WVPP is implemented, such as changes in staffing, engineering controls, construction or modification of the facilities, evacuation procedures, alarm systems and emergency response;
- 6. To include newly recognized workplace violence hazards;
- 7. To review and evaluate workplace violence incidents which result in a serious injury or fatality;
- 8. To review and respond to information indicating that the Plan is deficient in any area; or
- 9. When a revision to the WVPP is needed for only part of the facility or operation, the review process may be limited to the employees in the unit(s) or operation(s) affected by the revision, independently of the annual review for the Plan for the facility as a whole.

RESOURCES

- California Code of Regulations, Title 8, Section 3203. Injury and Illness Prevention Program.
- California Code of Regulations, Title 8, Draft Section 3343 Advisory website.
 Workplace Violence Prevention in General Industry Advisory Meetings (ca.gov)
- California Code of Regulations, Title 8, Draft Section 3343 Draft revisions 5/17/2022 compared to 10/24/2018. WVP in All Industries – May 17, 2022 Draft Text (ca.gov)
- State of California Department of Industrial Relations. Workplace Violence Prevention comparison of sections 3203, 3342, and draft 3343. <u>Side-by-side WPVP comparison of sections</u> 3203, 3342, and draft 3343 (ca.gov)

APPENDICES

APPENDIX A: Incident Log

Direct Link: https://cm.maxient.com/reportingform.php?SantaMonicaCollege&layout id=10

Workplace Violence Incident Log

This Log Completed By

Your full name:

Job title:

Your phone number:

Your email address:

Department, Location:

Date of incident:

Time of incident:

Location of incident:

Specific location:

Involved Parties

Please provide perpetrator and victim information:

Involved party 1

Name

Select Gender

Select Role Perpetrator Victim Witness

ID Number

DOB (YYYY-MM-DD)

Phone number

Email address

Address or Work Location

Questions

- WHAT TYPE OF WORKPLACE VIOLENCE OCCURRED?
- DETAILED DESCRIPTION OF THE EVENT:
- WHO COMMITTED THE VIOLENCE? (i.e., 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)
- WHAT WERE THE CIRCUMSTANCES AT THE TIME OF THE INCIDENT?

- WHERE DID THE INCIDENT OCCUR?
- WHAT TYPE OF WORKPLACE VIOLENCE OCCURRED?
- IF YOU SELECTED OTHER, PROVIDE WHAT TYPE OF WORKPLACE VIOLENCE OCCURRED.
- WHAT WERE THE CONSEQUENCES OF THE INCIDENT, INCLUDING, BUT NOT LIMITED TO:

Supporting Documentation

Photos, video, email, and other supporting documents may be attached below. 5GB maximum total size.

Submission

Workplace Violence Risk Assessment

Completed by Department Head or their designee
NA can be Not Applicable or Do Not Know

Location:			Department:		
Completed By:			Date:		
L					
Access control	Yes	No	NA	Comments/Questions	
Are employee-only areas separate from public areas?					
Are entrances and exits well marked?					
Is there a system to alert employees to emergencies?					
Are all potential hiding spots easily identifiable?					
Do you have an emergency button access, if yes where is it located?					
Does your area have a speed dial to Campus Police?					
Is there an emergency button or telephone in each elevator?					
Escape opportunities	Yes	No	NA	Comments/Questions	
Are there at least two exits and adequate routes of escape?					
Are common work areas or reception rooms organized to prevent employees from being trapped?					
Are private, locked restrooms available for employees?					
Are there places where employees can go for protection in an emergency? Where?					
Have isolated work situations or areas, such as an employee working alone at night, been evaluated for safety controls?					
Contact with public	Yes	No	NA	Comments/Questions	

Do employees work in direct contact with the public?				
Do employees exchange money with students, employees, or others?				
Do you have employees who work in vehicles?				
Do your employees work with unstable or volatile persons in health care, social services, or criminal settings?				
Do employees guard valuable goods or property (e.g., a museum or armored car)?				
Do employees work in community-based settings?				
Visibility	Yes	No	NA	Comments/Questions
Is the lighting inside and outside the facility adequate to see clearly at all times?				
Do employees feel safe walking across the campus?				
Are entrances to the building clearly visible to the public?				
Is the area surrounding the facility free from places of concealment, such as bushes?				
Is video surveillance provided outside the building?				
Storage areas	Yes	No	NA	Comments/Questions
Is there a secure place available for employees to store personal belongings?				
Are weapons stored at your facility?				
Cash handling	Yes	No	NA	Comments/Questions
Are limited amounts of cash kept on hand?				
Is there a safe for large amounts of cash?				
Does cashier have entry/exit separate from public access?				
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Does the cash-handling area have silent alarm? Do doors have spring-loaded closing with	
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automatic lock?	
Do doors have a keyed entry?	
Are deposits made randomly and are employees making deposits accompanied by another worker or security?	
Is cash collected by armored car company?	
Can employees clearly see all incoming visitors?	
Are cash handling areas monitored by security or video?	
Are there physical barriers at cash handling areas, such as glass or elevated floors?	
Security Yes No NA Comments/Questions	
Are trained security personnel readily available?	
Are floor plans posted showing entrances, exits, and security alarm locations?	
Is emergency contact information posted?	
Are additional security measures in place for employees who work at night or alone?	
When employees are working off-site, is there someone who knows where each worker is located?	
Building exterior Yes No NA Comments/Questions	
Do you have a Building Monitor?	
Do parking lots have security access?	

Could a worker calling for help be heard from the parking area? i.e., emergency call box or phone		
Are all potential hiding spots easily identifiable in parking structures?		
Is the parking area frequently patrolled by security?		
Are there signs of vandalism?		
Are building entrances clearly marked?		
Does outside lighting automatically go on in the dark?		
Are garbage disposal areas well lit?		
Do you know where the Automatic Electronic Defibrillator (AED's) are in your building?		
Do you know where the Stop the Bleed kit is in your building?		
If applicable, do you know where the emergency evacuation chairs are?		
Is assigned FOB access to your each of your employees appropriate?		