



# NAPA COUNTY OFFICE OF EDUCATION

Napa County Office of Education  
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## POLICY STATEMENT

Effective Date of Program: July 1, 2024

The Napa County Office of Education (NCOE) does not tolerate workplace violence in any form. This includes acts of violence or threats of violence. We are committed to the health and safety of our employees, pupils and visitors to our school sites and facilities. We refuse to tolerate any form of violence in the workplace and will make reasonable and appropriate efforts to prevent violent incidents from occurring by implementing a Workplace Violence Prevention Program (Herein referred to as WVPP).

NCOE will not ignore, condone, or tolerate *threats of violence* or *workplace violence* by any employee appointed or elected official, volunteer, contractor, parent, student, or visitor.

- *Threats of violence* include both verbal and non-verbal conduct that causes a person to fear for his or her safety because there is a reasonable possibility he or she might be physically injured and that serves no legitimate work-related purpose.
- *Workplace violence* means any act of violence or threat of violence that occurs at the work site. The term workplace violence shall not include lawful acts of self-defense or defense of others. Workplace violence includes 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 the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether or not the employee sustains an injury

All NCOE supervisors and employees are responsible for implementing and maintaining our WVPP. We encourage participation in designing and implementing our program. We require prompt and accurate reporting of all violent incidents or threats, whether or not physical injury has occurred. We will not discriminate against victims of workplace violence.

A copy of this policy statement and the WVPP Plan is readily available to all employees from [napacoe.org](http://napacoe.org), the NCOE SharePoint site and Human Resources.

Our Plan ensures that all employees adhere to work practices that are designed to make the workplace more secure, and do not engage in verbal threats or physical actions which create a security hazard for others in the workplace.

All employees are responsible and accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment. NCOE will not take punitive or retaliatory action against any staff member for seeking assistance or reporting concerns including seeking intervention from local emergency services or law enforcement when a violent incident occurs.

We define workplace violence as actions or words that endanger or harm another employee or result in other employee(s) reasonably believing to be in danger. Such actions include but are not limited to the following:

- Verbal or physical harassment
- Verbal or physical threats
- Assaults or other violence
- Any behavior(s) that causes others to feel unsafe (e.g., bullying, sexual harassment)

## LEGAL REQUIREMENTS

This plan includes the requirements of Senate Bill 553 approved by the Governor and filed with Secretary of State September 30, 2023. See information regarding restraining orders and the Workplace Violence Prevention Plan (WVPP) below.

Per California Education Codes 32280-32289.5, school sites are required to maintain and annually update a Comprehensive School Safety Plan (CSSP).

Additionally, Senate Bill 906 (effective July 1, 2023) requires school officials whose duties involve regular contact with pupils in any of grades 6 to 12, inclusive, as part of a middle school or high school, and who is alerted to or observes any threat or perceived threat to immediately report the threat or perceived threat to law enforcement, as provided.

The overlap of these codes and requirements are referenced herein.

### SB 553-Restraining orders and Workplace Violence Prevention Plan

- Existing law authorizes any employer, whose employee has suffered unlawful violence or a credible threat of violence from any individual that can reasonably be construed to be carried out or to have been carried out at the workplace, to seek a temporary restraining order and an order after hearing on behalf of the employee and other employees at the workplace, as described.
- Commencing January 1, 2025, a collective bargaining representative of an employee, as described, is authorized to seek a temporary restraining order and an order after hearing on behalf of the employee and other employees at the workplace, as described. The employer or collective bargaining representative of an employee, before filing such a petition, is to provide the employee who has suffered unlawful violence or a credible threat of violence from any individual an opportunity to decline to be named in the temporary restraining order. An employee's request to not be named in the temporary restraining order would not prohibit an employer or collective bargaining representative from seeking a temporary restraining order on behalf of other employees at the workplace, and, if appropriate, other employees at other workplaces of the employer. Reference [Senate Bill 553](#) for full details.
- The California Occupational Safety and Health Act of 1973 imposes safety responsibilities on employers and employees, including the requirement that an employer establish, implement, and maintain an effective injury prevention program, and makes specified violations of these provisions a crime. The act is enforced by the Division of Occupational Safety and Health (division) within the Department of Industrial Relations, including the enforcement of standards adopted by the Occupational Safety and Health Standards board (standards board).

Effective on and after July 1, 2024, Employers, as specified, are required to:

- establish, implement, and maintain, at all times in all work areas, an effective workplace violence prevention plan containing specified information
- record information in a violent incident log for every workplace violence incident, as specified
- provide effective training to employees on the workplace violence prevention plan, among other things, and provide additional training when a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan
- create and maintain records of workplace violence hazard identification, evaluation, and correction and training and violent incident logs and workplace incident investigation records, as specified

- make certain records available to the division, employees, and employee representatives, as specified
- include the workplace violence prevention plan (WVPP) as part of their effective injury prevention program (IIPP), a violation of which is a misdemeanor in specified circumstances.

In addition, Employers are authorized to appeal a citation and penalty, as specified.

The division:

- is required to issue, with reasonable promptness, a citation to an employer if, upon inspection or investigation, the division believes the employer has violated any standard, rule, order, or regulation established pursuant to specified provisions of law
- adheres to specific procedures for issuance of the citation
- provides there is a rebuttable presumption that a violation is enterprise-wide if an employer has multiple worksites and the division has evidence of a pattern or practice of the same violation or violations committed by the employer involving more than one of their worksites, or if the employer has a written policy or procedure that violates specified provisions of law, except as provided
- is authorized to impose certain civil penalties pursuant to specified law, including when any employer violates any occupational safety or health standard, order, or special order, depending on whether the violation is serious
- is required to enforce the workplace violence prevention plan and related requirements by issuance of a citation and a notice of civil penalty, as specified
- is required to propose, no later than December 1, 2025, and the standards board to adopt, no later than December 31, 2026, standards regarding the plan required by Senate Bill 553, as specified.

## SCOPE

In accordance with Section 6401.9 of the Labor Code, this Workplace Violence Prevention Plan fulfills the requirements of Senate Bill 553 (effective July 1, 2024).

NCOE policy requires an immediate response to all reports of violence. All violent and/or threatening incidents will be investigated and documented by the {Administrator of Human Resources, or Associate Superintendent. If appropriate, NCOE refers the effected staff member to supportive services as needed.

The following disciplinary actions may also be taken (SP 4118, SP 4119.21):

- Oral reprimand
- Written reprimand
- Suspension
- Termination

## DEFINITIONS

(a) For purposes of this section, the following definitions apply:

(1) “Emergency” means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

(2) “Engineering controls” mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.

(3) “Log” means the violent incident log required by this section.

(4) “Plan” means the workplace violence prevention plan required by this section.

(5) “Threat of violence” means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

(6) (A) "Workplace violence" means any act of violence or threat of violence that occurs in a place of employment.

(B) "Workplace violence" includes, but is not limited to, the following:

(i) 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.

(ii) 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.

(iii) The following four workplace violence types:

(I) "Type 1 violence," which means workplace violence committed by a person who has no legitimate business at the worksite, and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.

(II) "Type 2 violence," which means workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors. This includes parents, vendors and contractors.

(III) "Type 3 violence," which means workplace violence against an employee by a present or former employee, supervisor, or manager.

(IV) "Type 4 violence," which means 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.

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

(7) "Work practice controls" means procedures and rules which are used to effectively reduce workplace violence hazards.

The following employers, employees, and places of employment are exempt from this section:

- Employees teleworking from a location of the employee's choice, which is not under the control of the employer.
- Places of employment where there are less than 10 employees working at the place at any given time and that are not accessible to the public, if the places are in compliance with Section 3203 of Title 8 of the California Code of Regulations.

## **RESPONSE AND ACCOUNTABILITY**

The Workplace Violence Prevention Program Administrator is the Complaint Officers for staff and students, and they have the authority and responsibility for implementing the provisions of this program for NCOE.

### **(A) Workplace Violence Prevention Plan Administrator**

The Complaint Officers, or an assigned designee, is the designated WVP Plan Administrator (Administrator) and has the authority and responsibility for developing, implementing, and maintaining this plan and conducting or overseeing any investigations of workplace violence reports. The Complaint Officers will also be able to answer employee questions concerning this plan.

The Complaint Officers, or an assigned designee, shall solicit feedback and input from employees and their authorized representatives in developing and implementing the WVP plan. Active involvement of employees could include, but is not limited to, their participation in identifying, evaluating, and correcting workplace violence hazards; in designing and implementing training; and in reporting and investigating workplace violence incidents. The District ensures compliance with the plan by:

- Providing training and information to staff at various times such as, but not limited to, upon hire, annually or in periodic review as needed
- Encouraging reporting to the Plan Administrator.
- Making the plan available to staff which includes information about reporting violence and threats
- Inclusion in conducting site safety evaluations
- Debriefing of incidents (with considerations of confidentiality)

- Posting plan information at each location

The Complaint Officers, or an assigned designee, shall coordinate implementation of the workplace violence prevention plan with other employers (ex. contracted security staff, volunteers, and other employers on site), when applicable, to ensure those employers and their employees understand their respective roles as provided in the plan. These other employers and their staff shall be provided with training on the NCOE WVP plan.

**(B) Managers and Supervisors**

Responsibilities include:

- Implementing the plan in their work areas;
- Providing input to the Administrator regarding the plan;
- Participating in investigations of workplace violence reports; and
- Answering employee questions concerning this plan.

The Complaint Officers and all safety personnel are responsible for the observation of personnel and identification of potential workplace violence exposures. All matters reported and/or identified are to be fully investigated. Findings will be presented to the NCOE Department Responsible and an action plan developed to minimize and eliminate the potential threat.

**(C) Employees**

Responsibilities include:

- Complying with the plan;
- Maintaining a violence-free work environment;
- Attending all training;
- Following all directives, policies, and procedures; and
- Reporting suspicious persons in the area and alerting the proper authorities when necessary.

It is the responsibility of all employees to report all threatening behavior to their direct supervisor and/or the Complaint Officers immediately. The goal of this policy is to promote the safety and well-being of all people in our workplace. All incidents are to be reported within the first 24 hours through direct contact so that the incident may be handled swiftly. The supervisor or complaint officer will report the incident to Human Resources for documentation.

In addition, a WVPP Planning Group will be established to assess the vulnerability to workplace violence at NCOE and will be responsible for developing employee education and training programs in violence prevention and plans for responding to acts of violence. The WVPP Planning Group will serve as auditors for the Workplace Violence Prevention Program. The Workplace Violence Prevention Group will consist of:

Name:	John Zikmund
Title:	Administrator of Human Resources/Complaint Officer - Staff
Phone number:	707-253-6824
Description of role and responsibility:	Responsible for receiving and managing complaints from staff.

Name:	Julie McClure
Title:	Associate Superintendent/Complaint Officer - Students
Phone number:	707-253-6811
Description of role and responsibility:	Responsible for receiving and managing complaints from students.

responsibility:	
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Name:	Joshua Schultz
Title:	Deputy Superintendent
Phone number:	707-253-6832
Description of role and responsibility:	Will serve as Complaint Officer if both the Administrator of Human Resources and Associate Superintendent are unavailable.

Name:	Seana Wagner
Title:	Director Communications & Special Projects/Safety Coordinator
Phone number:	707-265-2351
Description of role and responsibility:	Supports the Complaint Officers with execution of the Workplace Violence Prevention Program.

Name:	Jeremy Smith
Title:	Director of General Services
Phone number:	707-253-6828
Description of role and responsibility:	Supports elements of the Workplace Violence Prevention Program related to facilities management.

## Compliance

All employees are responsible and will be accountable for using safe work practices for following all policies and procedures, and for assisting in maintaining a safe and secure work environment.

The NCOE ensures compliance with the plan by:

- Providing training and information to staff at various times such as, but not limited to, upon hire, annually or in periodic review as needed
- Encouraging reporting to the person(s) identified in item (A) Workplace Violence Prevention Plan Administrator
- Making the plan available to staff which includes information about reporting violence and threats
- Inclusion in conducting site safety evaluations
- Debriefing of incidents (with considerations of confidentiality)
- Posting plan information at each location
- [other if applicable]

Employees are to report workplace violence to the site manager or Complaint Officers.

Person(s) who receive a report or complaint about workplace violence or retaliation will investigate reports. Retaliation will be prohibited and that information will be included in the plan, in employee training and retraining programs, and in follow-up as part of an investigation and possible disciplinary action.

Human Resources and Safety Coordinator will:

- Inform employees about the Workplace Violence Prevention Program.
- Evaluate the performance of all employees in complying with workplace security measures.
- Provide training and /or counseling to employees who need to improve work practices designed to ensure workplace security.
- Follow established workplace security policies and procedures

NCOE will develop a comprehensive Workplace Violence Prevention Plan. The Plan shall be in writing and shall be available and easily accessible to employees (\*in languages representative of 10% or more of workforce i.e. Spanish, Vietnamese, Russian, etc. if applicable), authorized employee representatives, and representatives of the division at all times. 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. The written plan is maintained as a separate document.

The Complaint Officers will maintain an open, two-way communication system on all workplace safety, health, and security issues. NCOE has a communication system designed to encourage a continuous flow of safety, health, and security information between employees and our WVPP Group without fear of reprisal. Our communication system consists of the following:

- New employee orientation will address workplace security policies, procedures, and work practice.
- Periodic review of our WVPP with all personnel, with updates when new information or hazards become known.
- Regularly scheduled safety meetings with all applicable personnel that include workplace security discussions and safety drill debriefs
- A system to ensure that all employees, including managers and supervisors, understand and acknowledge the workplace security policies, including notice to all staff and training for managers.
- Posted or distributed workplace security information and updates.
- A system for employees to inform management about workplace security hazards or threats of violence.
- Procedures for protecting employees who report threats of retaliation by the offender after making an initial report.
- Posting of the comprehensive plan at each location.
- Training program with relevant resources and information on how to obtain copies of relevant records, where appropriate.
- Notice to employees, training for managers, and posting on NCOE Sharepoint site and napacoe.org.

## **HAZARD ASSESSMENT**

The Workplace Violence Prevention Group will perform workplace hazard assessment for workplace security in the form of record keeping and review, periodic workplace security inspections, and a workplace survey. The assessment group will identify workplace violence and security issues and make recommendations to management for implementation.

Workplace hazard assessments will include:

- An annual review of the past year's workplace violence incidents; and
- Periodic physical security assessments.

The Workplace Violence Prevention Environmental Hazard Assessment & Control Checklist (Appendix B) can be used to assist with the security assessment. Inspections are performed according to the following schedule:

- Once a year;
- When the plan is implemented;
- When new, previously unidentified workplace violence/security hazards are recognized; and
- When workplace violence injuries or threats of injury occur.

Reports or complaints by employees about potential workplace hazards or threats of violence will be taken seriously and a thorough hazard investigation will be conducted. When a report or complaint is about a potential Type 2 or Type 3 incident, or about another employee, the District/COE/Site will take every appropriate step to immediately conduct a risk assessment and investigation, using established principles of neutral, fact-finding investigations and balancing the rights of all concerned. Should the hazard assessment and investigation identify acts of violence or threats of violence that fall within Type 2 or Type 3 incidents, NCOE will make immediate corrections through appropriate disciplinary action and/or other immediate and appropriate corrective action.

## HAZARD CORRECTION AND ABATEMENT

*Work practice controls* will be used to correct unsafe work conditions, practices, or procedures that threaten the security of employees.

*Work practice controls* are defined as procedures, rules, and staffing that are used to effectively reduce workplace violence hazards. Work practice controls may include, but are not limited to:

- Appropriate staffing levels;
- Provision of dedicated safety personnel (i.e. security guards);
- Employee training on workplace violence prevention methods; and
- Employee training on procedures to follow in the event of a workplace violence incident.

Corrective actions will be implemented in a timely manner based on the severity of the hazard, documented and dated.

See Appendix A for recommendations.

## RECORD KEEPING AND REVIEW

Periodic updates and reviews of the following workplace violence reports and records will be made annually:

- OSHA 300 Logs
- Workplace Violence Incident Reports (see Appendix B – Violence Incident Log Template)
- Information compiled regarding assault incidents or threat incidents
- Police Reports
- Workplace Surveys
- Accident Investigations
- Training records for all staff to be created and maintained for a minimum of {Amount of 1 or more} year(s), which include a summary of the training along with the names and qualifications of persons conducting the training.
- Safety Grievances
- Inspection information
- Other relevant records
- NCOE SharePoint site and [napacoe.org](http://napacoe.org)

## VIOLENT INCIDENT LOG

NCOE records every workplace violence incident in a violent incident log. Log is held by Staff Complaint Officer as a digital document, also accessible to Student Complaint Officer.

Information that is recorded in the log for each incident shall be based on information solicited from the employees who experienced workplace violence, on witness statements, and on investigation findings. The employer shall omit any element of personal identifying information sufficient to allow 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. The log shall be reviewed during the periodic reviews of the plan required in subparagraph (L) of paragraph (2) of subdivision (c)

The District reviews the plan:

- annually,
- when a deficiency is observed or becomes apparent and
- after a workplace violence incident

(C) For purposes of this section, at a multiemployer worksite, the employer or employers whose employees experienced the workplace violence incident shall record the information in a violent incident log pursuant to subparagraph (A) and shall also provide a copy of that log to the controlling employer.

(2) The information recorded in the log includes all of the following:



(A) The date, time, and location 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 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.

(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, such as in the workplace, parking lot or other area outside the workplace, or other area.

(G) The type of incident, including, but not limited to, whether it involved any of the following:

(i) 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, but not limited to:

(i) Whether security or law enforcement was contacted and their response.

(ii) (ii) Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.

(iii) (I) Information about the person completing the log, including their name, job title, and the date completed.

## WORKPLACE SECURITY INSPECTIONS

A physical security survey will be conducted once a year. As NCOE continues to serve as a public educational agency, the possibility of potential violence within our workplace must be continuously reassessed. NCOE will reassess all facets of the work environment to include, but not be limited to: secure entrances, public access points, restroom facilities, parking lots, workstations, classrooms, and surveillance systems.

Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence will be performed by the following observer(s) in the following areas:

Jeremy Smith	Director of General Services	707-253-6828	All NCOE buildings and campuses
Greg Marshall	Facilities Operations Manager	707-253-6956	All NCOE buildings and campuses

Periodic inspections are performed according to the following schedule:

- Annually;
- When the WVPP is initially established July 2024;
- When new, previously unidentified security hazards are recognized;
- When occupational injuries or threats of injury occur; and
- Whenever workplace security conditions warrant an inspection.

Inspections for workplace security hazards from violence by Type 1 Individuals (Strangers) include assessing:

- The exterior and interior of the workplace for its security measures.
- The need for security surveillance measures, such as mirrors or cameras at points of entry and travel within the premises.
- Procedures for reporting suspicious persons or activities.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- The use of work practices such as “buddy” systems or security escort, as appropriate, for identified risks (e.g. received threats, restraining orders enacted, etc.).
- Adequacy of lighting and security for parking lots and areas of travel during night conditions.
- Any other identifiable security hazards.

Inspections for workplace security hazards from violence by Type 2 Individuals (Persons known to campus but not employed or enrolled) include assessing for the above (Type 1) as well as the following:

- Access to, and freedom of movement within the workplace.
- Adequacy of workplace security systems, such as door locks, security windows, and physical barriers to entry.
- Effectiveness of systems and procedures to warn others of a security danger or to summon assistance (e.g. alarms, notification systems, etc.).
- Availability of escape routes.
- Employees skills in de-escalation methods.
- Any other identifiable security hazards.

Inspections for workplace security hazards from violence by Type 3 (co-workers/enrolled students/parents) include assessing for the above (Type 1 and Type 2) as well as the following:

- How well the WVPP has been communicated to all {District/COE/SITE} employees.
- How well employees are able to communicate with each other and with management and support staff.

- How well employees know the warning signs of potential workplace violence.
- Access to, and freedom of movement within, the workplace by non-employees, specifically recently discharged employees.
- Frequency and severity of employee related threats of physical or verbal abuse reported.
- Any other identifiable security hazards.

Inspections for workplace security hazards from violence by Type 4 (personal relations) include assessing for the above (Type 1, Type 2, and Type 3) as well as the following:

- Access to, and freedom of movement within, the workplace by non-employees, specifically with whom an employee is having a dispute.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs.
- Warnings or law enforcement involvement to remove personal relations (offender) of employees from the worksite. Effectiveness of restraining orders and recognition of restrained parties.
- Any other identifiable security hazards

A Workplace Security Inspection Recommendations **template** is located within Appendix A of the WVPP.

## TRAINING AND INSTRUCTION

NCOE has established the following recommendations on training all employees with respect to workplace violence and security.

All employees shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the WVPP is first established and periodically thereafter. Training shall be provided to all new employees and to regular volunteers. Training shall also be provided to employees who have been given new job exercises for which site-specific workplace security training may be required. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards.

General workplace violence and security training and instruction includes, but is not limited to, the following:

- Explanation of the WVPP, including measures for reporting any violent acts or threats of violence.
- Recognition of workplace security hazards, including the risk factors associated with the Type 1, 2, 3, and 4 of workplace violence offenders.
- Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to the appropriate department or person responsible for receiving reports.
- How to recognize the potential for violence and factors that contribute to the escalation of violence and how to counteract them, and when to seek assistance to prevent or respond to violence.
- Introduction to methods of de-escalation and defusing potential hostile or threatening situation.
- Measures to summon others for assistance or support.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified routes of escape.
- Notification of law enforcement when a criminal act may have occurred.
- Provide or request emergency medical care or first aid in the event any violent act should occur to an employee.
- Resources available to all staff for coping with incidents of violence, including, but not limited to, critical incident stress debriefing through the Employee Assistance Program and/or Care Solace.

NCOE has chosen the following items for training and instruction for all employees and regular volunteers:

*Note: SB 553 mandates training to all employees that is material appropriate.*

- How to report violent incidents to law enforcement.
- Location and operation of alarm systems, communication systems, and other protective devices.
- Communication procedures.
- Strategies to avoid physical harm.
- 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.

- Employee assistance programs.
- How to prepare for and respond to an active shooter scenario at the workplace. \*Shall not be provided at any time when, or location where students are present\*
- Awareness of indicators that lead to violent acts.
- Review of anti-violence policy and procedures.
- De-escalation and communication training.
- Use of the “buddy” system or obtaining proper security, co-worker assistance in potential escalated situations.
- Pre-employment screening practices.
- Yearly virtual staff training.

## **EFFECTIVE PROCEDURES TO COMMUNICATE WITH EMPLOYEES CONCERNING POTENTIAL OR ACTUAL WORKPLACE VIOLENCE INCIDENTS**

Employee concerns will be investigated in compliance with the Plan requirements, which states:

“Procedures to identify and evaluate workplace violence hazards, include, but are not limited to, scheduled periodic inspections to identify unsafe conditions and work practices and employee reports and concerns. Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.”

Effective procedures to respond to actual or potential workplace violence emergencies, including, but not limited to, all of the following:

Effective means to alert employees of the presence, location, and nature of workplace violence emergencies.

NCOE alerts employees about workplace violence emergencies via various communication methods including but not limited to in-person or online meeting, phone call, direct text, emergency text notification, email, audio/visual alert system.

Evacuation or sheltering plans that are appropriate and feasible for the worksite.

For non-school sites, evacuation and/or sheltering plans are accessible from the NCOE SharePoint site.

For school sites, evacuation and sheltering plans are described in the Comprehensive School Safety Plan (CSSP) available at each location.

How to obtain help from staff assigned to respond to workplace violence emergencies, if any, security personnel, if any, and law enforcement.

In an emergency, call 9-1-1. To obtain help from staff assigned to workplace violence, contact those listed in the Workplace Violence Prevention Group above.

Procedures to develop and provide the training required in subdivision (e) which states: *“before filing a petition under this section, an employer or collective bargaining representative of an employee shall provide the employee who has suffered unlawful violence or a credible threat of violence from any individual an opportunity to decline to be named in the temporary restraining order. An employee’s request to not be named in the temporary restraining order shall not prohibit an employer or collective bargaining representative from seeking a temporary restraining order on behalf of other employees at the workplace, and, if appropriate, other employees at other workplaces of the employer.”*

The District provides all staff with information included in the Workplace Violence Prevention Plan, in SB 906-Homicidal Threats and, for school sites, the Comprehensive School Safety Plan (CSSP) via email, meetings/trainings, annual acknowledgement/notification, the NCOE SharePoint site and napacoe.org.

Procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic inspections to identify unsafe conditions and work practices and employee reports and concerns. Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.

## POST INCIDENT INVESTIGATION AND RESPONSE

NCOE procedure for investigating incidents of workplace violence, threats, and physical injury include:

Managers and supervisors will use the Workplace Violent Incident Log (Attachment A) to assist in documenting incidents and investigations.

These procedures will occur following an incident:

- Provide immediate medical care or first aid;
- Identify all employees involved in the incident;
- Provide Information for resources available to staff;
- Conduct a debriefing with all affected employees (including volunteers) and agencies associated with event.
- Determine if corrective measures developed under this plan were effectively implemented; solicit feedback from all employees and responding parties involved in the incident as to the cause of this incident and if injuries occurred, how injury could have been prevented; and
- Record the incident in the Workplace Violent Incident Log.
- Reviewing all previous incidents.
- Visiting the scene of an incident as soon as possible.
- Interviewing threatened or injured employees and witnesses.
- Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the offender.
- Conducting a post-incident debriefing as soon as possible after the incident with all employees, supervisors, and security involved in the incident.
- Determining the cause of the incident.
- Taking corrective action to prevent the incident from recurring.
- Recording the findings and documenting the corrective actions taken.

## INCIDENT RESPONSE TEAM

The following individuals are named to respond in the event a potential threat or live situation should occur. The Incident Response Team will coordinate all facets of the response, including the initial response in emergency situations, contacting of local authorities, and intervention of the subject and victim.

Jeremy Smith	Director of General Services	707-253-6828
Greg Marshall	Facilities Operations Manager	707-253-6956
John Zikmund	Administrator of Human Resources/Complaint Officer - Staff	707-253-6824
Julie McClure	Associate Superintendent/Complaint Officer - Students	707-253-6811
Joshua Schultz	Deputy Superintendent	707-253-6832
Seana Wagner	Communications Director/Safety Coordinator	707-265-2351

### (A) Evaluation and Intervention:

In order to assess the risk of the offender, suggested questions should be inquired of victims and individuals familiar with the offender's behavior, both prior to and after any alleged threat or action. Refer to Appendix C for the Individual Risk Assessment Questions Form.

## **(B) Assessment Review and Action**

Upon completion of the assessment, review results with NCOE. Options are to be considered in terms of intervention. If a threat is imminent, local authorities should be contacted **immediately**.

Full documentation of the perceived or real threat must be well maintained. If an incident occurs, complete the appropriate job site investigation and witness statement forms.

## **(C) Communication**

Communicate course of action with all management, victim, and subject in question. Clearly define the course of action this policy lays forth in terms of discipline.

## **ANNUAL REVIEW**

The NCOE Workplace Violence Prevention Plan will be reviewed annually and updated as needed considering the following criteria:

- Staffing;
- Sufficiency of security systems;
- Job, equipment, and facility design and risks;
- Modifications or additions to tasks and procedures that affect plan implementation;
- Newly identified hazards;
- Prior year incidents;
- Identified deficiencies; and
- Feedback provided by employees and their authorized representatives.

# **Appendix A – Workplace Security Inspection Recommendations**

## **Workplace Hazard Control and Prevention**

**In Order to reduce the risk of workplace violence, the following measures have been recommended:**

- Research implementation of visitor registration system

## **Engineering Controls and Building or Work Area Design:**

- Continue to maintain appropriate lighting for areas such as outdoor campuses and parking

## **Workplace Practices:**

- Implementation and training for Workplace Violence Prevention Plan
- Update Injury Illness Prevention Program
- Establish Violent Incident Log
- Continue to perform regular assessment of hazard controls

## **Final Recommendations:**

**Based on the records review, workplace security inspections and workplace surveys, the Workplace Violence Prevention Group has identified the following issues that need to be addressed:**

- Research implementation of visitor registration system
- Continue to maintain appropriate lighting for areas such as outdoor campuses and parking
- Implementation and training for Workplace Violence Prevention Plan
- Update Injury Illness Prevention Program
- Establish Violent Incident Log
- Continue to perform regular assessment of hazard controls

**Management has instituted the following as a result of the workplace violence hazard assessment and the recommendations made by the Workplace Violence Prevention Group:**

Management has assigned the tasks stated above to the appropriate staff, and progress will be assessed as part of the ongoing work of the Workplace Violence Prevention Group, and the annual review of the Workplace Violence Prevention Plan.



## Appendix B – Violent Incident Log Template

***“The employer shall record information in a violent incident log about every incident, postincident response, and workplace violence injury investigation performed in accordance with paragraph (11) of subdivision (b). Information about each incident shall be based on information solicited from the employees who experienced the workplace violence. The employer shall omit from the violent incident log any element of personal identifying information sufficient to allow 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.”***

(1) The date, time, specific location, of the incident:  
**{Typeable field to go here}**

(2) A detailed description of the incident:  
**{Typeable field to go here}**

(3) A classification of who committed the violence, including whether the perpetrator was a Type 1, Type 2, Type 3, or Type 4, or other perpetrator:  
**{Typeable field to go here}**

(4) A description 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, working in an unfamiliar or new location, or other circumstances:  
**{Typeable field to go here}**

(5) A description of where the incident occurred, including, but not limited to, whether it was in an office, hallway, restroom or bathroom, parking lot or other area outside the building, personal residence, break room, cafeteria, or other area:  
**{Typeable field to go here}**

(6) The type of incident, including whether it involved any of the following:  
(A) Physical attack, including biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.  
(B) Attack with a weapon or object, including a gun, knife, or other object.  
(C) Threat of physical force or threat of the use of a weapon or other object.  
(D) Sexual assault or threat, including rape or attempted rape, physical display, or unwanted verbal or physical sexual contact.  
(E) Verbal harassment.

(F) Animal attack:

(G) Other.

**{Typeable field to go here}**

(7) Consequences of the incident, including:

(A) Whether medical treatment was provided to the employee.

(B) Who, if anyone, provided necessary assistance to conclude the incident.

(C) Whether security was contacted and whether law enforcement was contacted.

(D) Amount of lost time from work, if any.

(E) Actions taken to protect employees from a continuing threat, if any.

**{Typeable field to go here}**

Person completing the violent incident log **{Typeable field to go here}**

Name:

Job Title:

Phone Number:

Email Address:

Date Completed:

## Appendix C – Individual Risk Assessment Questions

Date	Name and Title:	Supervisor and Title:
1	Why has the offender threatened, made comments that have been perceived by others as threatening, or taken this action at this particular time? What is happening in their life that has prompted this?	
2	What has been said to others (e.g., friends, colleagues, coworkers) regarding what is troubling them?	
3	How does the offender view themselves in relation to everyone else?	
4	Do they feel they have been wronged in some way?	
5	Do they accept responsibility for their own actions?	
6	How does the offender cope with disappointment, loss, or failure?	
7	Do they blame others for their failures?	
8	How does the offender interact with coworkers?	
9	Do they feel the company is treating them fairly?	
10	Do they have problems with supervisors or management?	
11	Are they concerned with job practices and responsibilities?	
12	Have they received unfavorable performance reviews or been reprimanded by management?	
13	Are they experiencing personal problems such as divorce, death in the family, health problems, or other personal losses or issues?	

14	Are they experiencing financial problems, high personal debt, or bankruptcy?
15	Is there evidence of substance abuse or mental illness/depression?
16	Have they shown an interest in violence through movies, games, books, or magazines?
17	Are they preoccupied with violent themes; interested in publicized violent events; or fascinated with and/or recently acquired weapons?
18	Has the offender identified a specific target and communicated with others their thoughts or plans for violence?
19	Are they obsessed with others or engaged in any stalking or surveillance activity?
20	Has the offender spoken of homicide or suicide?
21	Do they have a past criminal history or history of past violent behavior?
22	Does the offender have a plan for what they would do?
23	Does the plan make sense and is it reasonable and specific?
24	Does the offender have the means, knowledge, and wherewithal to carry out their plan?

Form Completed By:

Other Individuals Present:

Date Completed:

Time: