



# COUNTY OF IMPERIAL

## Workplace Violence Prevention Plan

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## COUNTY OF IMPERIAL

### WORKPLACE VIOLENCE PREVENTION PLAN

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

**Date of Last Review:** 07/01/2024

**Date of Last Revision(s):** 07/01/2024

#### **POLICY**

County of Imperial is committed to providing a work environment that is free of disruptive, threatening, or violent behavior involving any employee, appointed or elected official, volunteer, contractor, client and/or visitor. Our policy is to establish, implement, and maintain an effective plan as required by SB 533. The regulation requires us to establish, implement, and maintain, at all times in all our facilities, a workplace violence prevention plan for the purpose of protecting employees and other personnel from aggressive and violent behavior at the workplace.

Our WVPP is available upon request for examination and copying to our employees, their representatives, and the Chief of Cal/OSHA or his or her designee.

#### **PROHIBITED ACTS**

County of Imperial will not ignore, condone, or tolerate threats of violence or workplace violence by any employee, appointed or elected official, volunteer, contractor, client, 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 they 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:
  - o 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.

In addition, the County of Imperial prohibits all dangerous weapons not used for fire suppression, accident and incident response, emergency medical services, the service of law enforcement, or security duties on all County of Imperial Property. The exemption for licensees under 171b(b)(3) to carry in public buildings is permitted unless another specific restriction applies. Any employee or appointed or elected official in possession of prohibited dangerous weapons on County of Imperial property is in violation of this policy and may be subject to disciplinary action up to and including dismissal. Any volunteer, contractor, client, or visitor in possession of prohibited dangerous weapons will be banned from the premises. Dangerous weapons include any instrument capable of inflicting death or serious bodily injury.

**Workplace violence can be categorized into four types:**

- **Type 1 violence** - Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.
- **Type 2 violence** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.
- **Type 4 violence** - Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

## **RESPONSIBILITY**

The Director of Human Resources & Risk Management is designated as the WVPP Administrator and has the authority and responsibility for implementing the provisions of this plan for the County of Imperial.

As included in the County of Imperial's Injury and Illness Prevention Program (IIPP), all managers and supervisors are responsible for implementing and maintaining the safety program in their work areas and for answering employees' questions about the WVPP. This includes providing a secure work environment for their staff, identification of security risks, staff training needs, the development and management of departmental security policies and procedures, incident reporting, investigation and follow-up. Departments will have the discretion to establish internal safety policies for their employees as required by their specific work areas and/or work

assignments. Department internal policies will supersede the County's WVPP so long as it satisfies the minimum requirements of the County's WVPP.

All employees and building occupants and/or visitors are responsible for reporting hazards and injury or illness incidents per the IIPP, including hazards and incidents related to workplace violence.

### **EMPLOYEE ACTIVE INVOLVEMENT**

The WVPP Administrator or designee, shall solicit feedback and input from employees and their authorized representatives in developing and implementing the WVPP. 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.

### **EMPLOYEE COMPLIANCE**

Management is responsible for ensuring that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

All affected employees will follow all workplace security directives, policies, and procedures, and assist in maintaining a safe work environment.

Our system of ensuring that all employees comply with the rules and maintain a safe work environment:

- Informing employees, supervisors, and managers in the provisions of the WVPP.
- Ensuring all employees receive training of this plan during new employee safety orientation.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace.
- Discipline employees for failure to comply with the WVPP.
- Ensuring training of this plan is conducted on an annual basis.

### **COMMUNICATION WITH EMPLOYEES**

Managers and supervisors are responsible for communicating with employees about workplace violence in a form readily understandable by all employees.

Employees are encouraged to inform their supervisors about any threats of violence or workplace violence. Employees may use the **Violent Incident Report (Exhibit A)** to assist in their reporting of incidents.

Our communication system is designed to facilitate a continuous flow of workplace violence prevention information in a form that is readily understandable by all employees, and consist of the following:

- New employee orientation that includes workplace violence prevention policies and procedures.
  - Workplace violence prevention training programs.
  - Regularly scheduled safety committee meetings that address security issues and potential workplace violence hazards.
  - Effective communication between employees and supervisors about workplace violence prevention and violence concerns, including translation when appropriate.
  - Posted or distributed workplace violence prevention information.
  - Employees can anonymously report a violent incident, threat, or other violence concerns using the **Violent Incident Report (Exhibit A)**.
  - Employees can report to their management about workplace security hazards or threats of violence without fear of reprisal or adverse action.
- If warranted, call 911 and other appropriate emergency contacts for that facility, particularly if the situation requires immediate medical and/or law enforcement personnel.
  - Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.
  - Employees' concerns will be investigated in a timely manner, and they will be informed of the results of the investigation along with corrective actions to be taken, if applicable.
  - Hiring of outside consulting firm to assist in implementation of the WVPP.

## **COORDINATION WITH OTHER EMPLOYERS**

Managers and supervisors or assigned designee, shall coordinate implementation of the WVPP with other employers (contracted security staff and other employers on site), when applicable, to ensure those employers and their employees understand their respective roles as provided in the WVPP. These other employers and their staff shall be provided with training on County of Imperial's WVPP.

## **WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

Any incident of actual violence and any direct or indirect threat of violence should be reported immediately to a supervisor, manager, security personnel or to the WVPP Administrator.

All crimes will be reported to the appropriate law enforcement authority.

No employee will be subject to retaliation or harassment for reporting workplace violence in accordance with this policy.

## Restraining Orders

Employees or other personnel affiliated with County of Imperial who have an active restraining order issued against another person that includes the workplace are encouraged to provide a copy of the restraining order to their supervisor and the WVPP Administrator. Supervisors who receive notification of a restraining order that includes the workplace will meet with the WVPP Administrator to decide what action, if any, needs to be initiated.

Employees can report incidents, threats, hazards and concerns of workplace violence to their supervisor, and/or WVPP Administrator anonymously by completing a **Violent Incident Report (Exhibit A)**.

## EMERGENCY RESPONSE PROCEDURES

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

- For immediate assistance in an emergency contact emergency services or law enforcement by calling 911 and then notify your supervisor and/or the WVPP Administrator.
- Request assistance from security personnel if present.
- Departments have extended access to radio communications.
- The County of Imperial Departments will have evacuation and sheltering plans.

| EMERGENCY PHONE NUMBERS                                                     |                            |
|-----------------------------------------------------------------------------|----------------------------|
| FOR                                                                         |                            |
| <small>(Please Give <u>Exact Address</u> of This Worksite Location)</small> |                            |
| Physicians:                                                                 | Company Nurse 877-545-9157 |
| Hospitals:                                                                  |                            |
| Ambulances:                                                                 | 911 or                     |
| Fire Department:                                                            | 911 or                     |
| Police:                                                                     | 911 or                     |

## **WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION**

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

Workplace hazard assessment will include:

- An annual review of the past year's workplace violence incidents and reported 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.

### **Periodic Inspections**

Periodic inspections to identify and evaluate workplace violence and hazards will be performed. Each department will assign a competent observer(s) to perform periodic inspections to identify and evaluate workplace hazards.

Periodic inspections are performed according to the following schedule:

- Annually.
- When WVPP is established.
- When new, previously unidentified workplace violence security hazards are recognized.
- When workplace violence security incidents occur.

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including our policy prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act except as a last resort with our Run, Hide, Fight – Active Shooter Protocol.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Employees' skill in safely handling threatening or hostile service recipients (example: security guards).



- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- How well our establishment's management and employees communicate with each other.
- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

## **WORKPLACE VIOLENCE HAZARD CORRECTION**

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:

- Make the workplace unattractive to criminal activity.
- Ensure adequacy of workplace violence systems (i.e. shelter in place, evacuation routes, control measures).
- 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.

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

After a workplace incident, managers and supervisors will implement and enforce procedures for post-incident response and investigation including but not limited to:

- Contact emergency personnel for medical services.
- Identify all employees involved in the incident and complete a **Violent Incident Investigation (Exhibit B)**.
- Visit the scene of an incident as soon as safe and practical.
- Offer employees Employee Assistance Program services.
- Interview employees and witnesses, and any other involved parties.
- Conduct a debriefing with all affected staff.
- Examine the workplace for security risk factors associated with the incident including any previous reports of inappropriate behavior by the perpetrator, if any.

- Determine if corrective measures developed under this plan were effectively implemented.
- Solicit feedback from all personnel involved in the incident as to the cause of this incident and if injuries occurred, how injury could have been prevented.
- Determine the cause of the incident.
- Take corrective action to prevent the incident from recurring.
- Obtain copies of any reports completed by law enforcement, if any.
- Record the findings and corrective actions taken, using the **Workplace Violent Incident Log (Exhibit C)**, which will include the date, time, location, description of the type of the event and circumstances leading up to it, as well as the identity of the persons involved.

## **TRAINING AND INSTRUCTION**

All employees, including managers and supervisors, will have training and instruction on general and specific workplace violence practices. Training on risk factors associated with workplace violence and proper handling of emergency situations will be provided to employees in order to minimize the risks of violent incidents occurring in the workplace.

Training and instruction will be provided as follows:

- When the WVPP is implemented, and annually thereafter.
- Annually to ensure all employees understand and comply with the plan.
- At the time of hire.
- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Employees who receive training in a form other than live will have the opportunity to meet with a person knowledgeable on the plan for interactive questions to be answered.

General workplace security training and instruction include, but are not limited to the following:

- Explanation of the WVPP for workplace security including measures for reporting any violent acts or threats of violence.
- Recognition of workplace security hazards including the risk factors associated with the types of workplace violence.
- Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
- How to obtain a copy of the WVPP at no cost, and how to participate in development and implementation of the plan.

In addition, provide specific instructions to all employees regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

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

County of Imperial ensures that the written WVPP shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by accessing County of Imperial Human Resources & Risk Management's website: <https://hr.imperialcounty.org/>.

## **RECORDKEEPING**

County of Imperial will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Create and maintain training records for a minimum of one (1) year and include the following:
  - Training dates.
  - Contents or a summary of the training sessions.
  - Names and qualifications of persons conducting the training.
  - Names and job titles of all persons attending the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years which shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.

All records required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

## **EMPLOYEE ACCESS TO RECORDS**

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within **15 calendar days of a request**:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

## **ANNUAL REVIEW**

The County of Imperial's WVPP will be reviewed annually and updated as needed considering the following:

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

## **EMPLOYER REPORTING RESPONSIBILITIES**

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



## COUNTY OF IMPERIAL Violent Incident Report

### Violent Incident-Report Instructions

Employees are encouraged to inform their supervisors about any threats of violence or workplace violence. If that is not possible, employees may report incidents directly to the WVPP Administrator. Employees may use this form to assist in their reporting of incidents.

Supervisors receiving a report of workplace violence must complete this form with as much detail as possible to support an investigation. The original report must be forwarded through all appropriate levels of supervision, Department Head or their Designee, and Human Resources & Risk Management Department. The department must maintain the original form. Department of Human Resources will maintain a copy.

**Employee Information** (employees making an anonymous report do not have to identify themselves)

Reporting Employee: \_\_\_\_\_

Affected Employee(s): \_\_\_\_\_

Affected Employee(s) Job Title(s): \_\_\_\_\_

Department: \_\_\_\_\_

Facility Address: \_\_\_\_\_

### Incident Information

Date incident occurred: \_\_\_\_\_

Time incident occurred: \_\_\_\_\_

Specific address and detailed description of where incident occurred (i.e. empty hallway, warehouse bathroom):

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### Definitions of Violent Incident Types

- Type I violence: workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
- Type II violence: workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- Type III violence: workplace violence against an employee by a present or former employee, supervisor, or manager.
- Type IV violence: workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

## Checklist of Questions to Answer After a Violent Incident

1. Which type of person threatened or assaulted the employee(s)?

Type I: ☐ Stranger ☐ Thief/Suspect ☐ Other

Type II: ☐ Client/Customer ☐ Passenger ☐ Person in Custody ☐ Patient ☐ Visitor

Type III: ☐ Current Co-worker ☐ Former Co-worker ☐ Supervisor/ Manager

Type IV: ☐ Describe the personal relationship with employee (i.e. spouse, partner, relative, friend):

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2. What type of violent incident occurred (check all that apply)?

☐ Verbally Threatened ☐ Physically Assaulted ☐ Punched

☐ Slapped ☐ Grabbed ☐ Pushed ☐ Choked ☐ Kicked ☐ Bitten

☐ Hit with Object ☐ Threatened with Weapon ☐ Assaulted with Weapon ☐ Animal Attack

☐ Other (Describe): \_\_\_\_\_

3. Was a weapon used? ☐ Yes ☐ No

Describe the incident:

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4. Was/were the employee(s) working alone? ☐ Yes ☐ No

If not, who was/were with the employee(s) that may have witnessed the incident?

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5. Were there threats made before the incident occurred? ☐ Yes ☐ No

If yes, was it ever reported to the employee's supervisor or manager that the employee(s) was/were threatened, or was/were suspicious that the attacker may become violent?

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### Reporter Information

Report Completed By: \_\_\_\_\_

Department/Job Title: \_\_\_\_\_

Date: \_\_\_\_\_ Phone number: \_\_\_\_\_

Email: \_\_\_\_\_



## COUNTY OF IMPERIAL Violent Incident Investigation

### Violent Incident Investigation Instructions

The Department Head or Designee will complete the investigation into the violent incident. Further investigation and resolution of the incident is expected within seven (7) days in addition to submitting a copy of the completed investigation to Human Resources & Risk Management.

### Incident Analysis To be completed by Department Head/Designee or HR Professional:

Has this type of incident occurred before at the workplace? ☐ Yes ☐ No

What were the main factors that contributed to the incident?

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What could have prevented or at least minimized the damage caused by this incident?

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### Post-Incident Response

☐ Yes ☐ No Did the employee(s) require medical attention as a result of the incident?

☐ Yes ☐ No Did the employee(s) miss work as a result of the incident?

☐ Yes ☐ No Did the employee(s) apply for workers' compensation?

☐ Yes ☐ No Was security or law enforcement contacted?

☐ Yes ☐ No Was building facilities contacted?

☐ Yes ☐ No Was immediate counseling provided to affected staff and witnesses?

☐ Yes ☐ No Was critical incident debriefing provided to all affected staff who desired it?

☐ Yes ☐ No Was post-trauma counseling provided to affected staff who desired it?

Has there been follow-up with the Employee(s)? ☐ Yes ☐ No

Is this a recurring event? ☐ Yes ☐ No

Are there modifications to be made to the WVPP to reflect updated practices? ☐ Yes ☐ No

Describe updates to the WVPP:

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Investigation completed by: \_\_\_\_\_

Department/Job Title: \_\_\_\_\_

Date: \_\_\_\_\_ Phone number: \_\_\_\_\_

Email: \_\_\_\_\_

## Exhibit C – Violent Incident Log and Instructions

Every workplace violence incident is reported and recorded in a violent incident log. Any element of personal identifying information (such as a person's name, address, telephone number or social security) sufficient to allow identification of any person involved in a violent incident will not be recorded. No other information that, alone or in combination with other publicly available information, could reveal the person's identity should be recorded in the log.

Upon receipt of report, Human Resources & Risk Management assigns an incident number for tracking including date of report, Department, initials of who completed the log entry without including employee's name. Tracking should include date, time and location, violence type, type of assault, and incident detailed description.

It is expected that incident reports and investigations are sent to Human Resources & Risk Management in a timely manner via email: [LilianCasillas@co.imperial.ca.us](mailto:LilianCasillas@co.imperial.ca.us); [YadiraAyala@co.imperial.ca.us](mailto:YadiraAyala@co.imperial.ca.us)

Departments are expected to review the data at least quarterly and make improvements to prevent further incidents.

[illegible]