

# PALOMAR COMMUNITY COLLEGE DISTRICT

## WORKPLACE VIOLENCE PREVENTION PROGRAM

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

### PURPOSE

As a result of [California Senate Bill 553 \(SB 553\)](#), all employers that fall within the scope of [California Labor Code \(LC\) 6401.7 and LC 6401.9](#), are required to establish, implement, and maintain an effective, written Workplace Violence Prevention Plan (WVPP) no later than July 1, 2024.

This 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](#). 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 WVPP works in conjunction with applicable District Policies and Procedures and Collective Bargaining Agreements, including but not limited to Article 13: Safety of the Palomar Faculty Federation (PFF)/District agreement and Article 25: Health and Safety of the Council of Classified Employees (CCE)/District agreement.

### DEFINITIONS

**Emergency** - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

**Engineering controls** - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.

**Workplace Violence Incident Log** - The violent incident log required by LC section 6401.9.

**Workplace Violence Prevention Plan (WVPP)** - The workplace violence prevention plan required by LC section 6401.9.

**Serious injury or illness** - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

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

**Workplace violence** - Any act of violence or threat of violence that occurs in a place of employment.

**Workplace violence** includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an

injury.

- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:
  - **Type 1:** 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:** Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
  - **Type 3:** Workplace violence against an employee by a present or former employee, supervisor, or manager.
  - **Type 4:** Workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.

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

**Work practice controls** - Procedures and rules used to effectively reduce workplace violence hazards.

## RESPONSIBILITY

### **Workplace Violence Prevention Plan Administrator**

The WVPP administrator, Assistant Superintendent/Vice President, Human Resource Services, has the authority and responsibility for implementing the provisions of this plan for the District. Other areas of responsibility for implementing the plan are outlined below:

#### **Campus Police, (760) 744-1150 x2289 or (760) 891-7273, [policedispatchers@palomar.edu](mailto:policedispatchers@palomar.edu)**

Campus Police will take an active role in addressing acts of campus violence by providing immediate intervention in crisis situations, coordinating appropriate support services in situations of on-going safety concerns and by providing notification to the applicable human resources office of reports of acts of violence, intimidation and threat through the WVPP Threat Assessment Team. In addition to the 60 day crime log required by the Clery Act, campus police will also report to EH&S all crimes and investigations that involve violence and employees.

#### **Human Resources, (760) 744-1150 x2609, [hrhelp@palomar.edu](mailto:hrhelp@palomar.edu)**

Human Resources will administer and investigate allegations of workplace violence, investigations will follow the procedures in accordance with BP 3510, and AP 3510. Additionally, Human Resources will provide all parties with supportive measures. Human Resources is responsible for maintaining the list of applicable workplace violence prevention trainings available to employees.

#### **Environmental Health and Safety/Risk Management (EH&S/RM), (760) 744-1150 x2629, [ehs@palomar.edu](mailto:ehs@palomar.edu)**

Environmental Health and Safety/Risk Management (EH&S/RM) will be responsible for the coordination of the WVPP with the District's Injury and Illness Prevention Plan (IIPP), by reporting to Cal/OSHA when applicable, and coordination with the District's liability insurance.

### **Administrators, Managers and Supervisors**

Administrators, managers, and supervisors must be trained in workplace violence/prevention and to make training opportunities accessible to the employees who report to them.

#### **Administrators/Managers**

It is the responsibility of vice presidents, deans, directors, and managers to ensure that individuals under their management have authority to implement appropriate safety policies, practices, and programs. Administrators support safety programs and practices by ensuring that areas under their management comply with safety policies.

#### **Supervisors**

Supervisors are responsible for protecting the health and safety of employees under their supervision.

- Supervisors implement district and department safety policies, practices, and programs ensuring that the work environment is safe.
- Supervisors will investigate and report all accidents and near misses that occur.
- Supervisors will identify and correct hazardous conditions.
- Supervisors ensure that all employees receive and understand safety training so that they may perform their job duties safely.

#### All Employees and Student Workers

The most preventative measures lie in the ability of employees and student workers to perform their work safely by being informed of conditions that affect his or her health and safety. After participating in training programs provided by supervisors, employees and student workers are expected to perform their work in compliance with occupational safety and health CAL/OSHA standards and regulations, working in a safe and efficient manner with regard for the safety of themselves and others.

All staff must immediately report all accidents, no matter how slight, to their supervisor.

## EMPLOYEE ACTIVE INVOLVEMENT

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

#### Safety and Security Committee

Palomar Community College District elects to use a labor/management safety and health committee, meeting all the requirements of T8CCR 3203 (7)(c)(1) – (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.

The Safety and Security Committee meets the first Wednesday of the month from 1:00 p.m. - 2:30 p.m. The Committee examines the operation of the District with respect to safety and security. Areas considered by the Committee are periodic safety inspections, general safety of facilities, inspection of hazardous materials and equipment, designation of dangerous areas, general laboratory safety, and all matters concerning risk management. California Code of Regulations, Title 8, Section 3203 requires all California employers to establish and maintain effective Injury and Illness Prevention Programs (IIPP). These must be written and include elements of California Labor Code Section 6401.7. The IIPP will reference the WVPP as well. The Safety & Security Committee reports to the Finance & Administrative Services Planning Council and is chaired by the Manager of Environmental Health & Safety/Risk Management.

The Safety and Security Committee will receive monthly reports on the number of reportable incidents of workplace violence. The committee will make recommendations as it relates to safety, training, and procedures regarding WVPP, BP 3510, and AP 3510, and report incidents to CALOSHA, when applicable.

#### Campus Police Committee

Campus Police meets with campus constituents the third Wednesday of the month from 1:30p.m.-2:30 p.m. during the Fall and Spring semester. It is an opportunity to ask questions of the police and for the Chief of Police to share updates on hiring, equipment and community outreach.

#### Behavioral Health and Campus Wellness Committee (BHCW)

Chaired by the Director of Behavioral Health, it is an opportunity for constituent groups to bring concerns about student and staff mental health. The committee meets the second Thursday of the month from 2:00 p.m.-3:00 p.m.

## EMPLOYEE COMPLIANCE

All employees will follow all workplace violence prevention plan policies and procedures and assist in maintaining a safe work environment. To help ensure that employees comply with the WVPP, the District will at minimum provide the following:

- Training for all employees, supervisors, and managers in the provisions of District's Workplace Violence Prevention Plan (WVPP) and BP 3510 and AP 3510.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Employees who failure to comply with the WVPP, may be subject to corrective action and discipline in accordance with applicable collective bargaining agreements, handbooks, board policies, and/or applicable laws.
- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees.

## **COMMUNICATION WITH EMPLOYEES**

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

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Supervisors will ensure that information is disseminated to employees workplace violence prevention and violence concerns within the assigned area.
- Posted or distributed workplace violence prevention information.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
- Employees will be able to access mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.
- Incidents of workplace violence will be investigated in accordance with AP/BP

## **WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

Employees may report incidents by submitting an Incident Report to Human Resources through the Incident Report Link found on the HR website or directly here:

[https://cm.maxient.com/reportingform.php?PalomarCollege&layout\\_id=0](https://cm.maxient.com/reportingform.php?PalomarCollege&layout_id=0)

Once an administrator or supervisor has knowledge of workplace violence incidents under their administrative area, they must immediately report the incident in accordance with the established reporting procedures.

BP 3510 and AP 3510 prohibit retaliation against any employee who submits a report, and any incidents of retaliation shall be immediately reported to Human Resources in accordance with the policy.

## **EMERGENCY RESPONSE PROCEDURES**

Palomar Community College District (District) has specific measures to handle actual or potential workplace violence emergencies outlined in BP 3510 and AP 3510.

The District prioritizes the safety and security of its campus community and safeguards its property and facilities. The WVPP serves as a critical framework in achieving this commitment, activated in response to various triggering factors. Complementing the WVPP is the District's Emergency Operation Plan (EOP). This plan outlines emergency preparedness protocols for any serious threat, hazard, or emergency that may arise. The Emergency Operations Plan (EOP) establishes organizational structures, delineates chains of command, and outlines policies and procedures for Campus Police, EH&S, employees, and students during emergencies. This comprehensive plan enables employees to better equip themselves to respond promptly and effectively, aiming to significantly mitigate loss and negative impacts when emergencies occur.

Despite the unpredictability of such situations, the EOP facilitates an immediate and coordinated response by

Campus Police and district employees, minimizing potential danger to the campus community. Particularly noteworthy is the Threat and Hazard-Specific Annexes section, which details goals, objectives, and courses of action for addressing various threats or hazards such as workplace violence, cyber-attacks, earthquakes, fires, or hazardous materials incidents and relevant evacuation and shelter in place protocols. These annexes serve as comprehensive guides on managing functions before, during, and after an emergency incident.

Through meticulous planning, diligent training, and swift implementation of established procedures, the Palomar Community College District remains steadfast in its commitment to ensuring the safety and well-being of all stakeholders within its campus community, including effective means to alert employees of workplace violence emergencies in accordance with the EOP.

### ***Communications Protocol***

The Communications Annex within the EOP ensures the availability and coordinated use of our communications systems for the dissemination of disaster information, exchange of information between decision-makers, and coordination of communications with local response agencies. When activated, this annex coordinates and supports emergency response/recovery telecommunications requirements, including interfacing with other agencies and outside organizations such as local, state, and federal government entities, private nonprofit organizations, and business/industry partners.

### ***Internal Communications***

Staff will be promptly notified when an incident occurs and will be kept informed as additional information becomes available and as plans for managing the situation evolve. The following practices will be utilized to disseminate information internally when appropriate:

The alert notification system will be used to activate and communicate within our emergency management system, according to the District's EOP. It may also be utilized to activate and manage the Emergency Operations Center (EOC).

### ***Emergency Alert Notification Devices:***

- Email Notices/Alerts: District issued email account ([@palomar.edu](mailto:@palomar.edu) or [@student.palomar.edu](mailto:@student.palomar.edu))
- On Campus Broadcast Alerts: Campus phones (InformaCast), Loudspeakers,
- Palomar Community College District Website
- Text Messages for Employees: [www.palomar.edu/pages/hr/forms](http://www.palomar.edu/pages/hr/forms) (Sign up to receive)
- Text Messages for Students: <https://my.palomar.edu> (Sign up to receive)
- Palomar Community College District on Twitter, Instagram and Facebook

### ***Safety and Security Committee***

Workplace incidents will be presented at regularly scheduled Safety and Security Committee meetings as needed. These meetings are a place to ask clarifying questions and share information regarding an incident, address new procedures and/or temporary changes. This integrated approach provides a comprehensive overview of the communication protocols within the Emergency Response Procedures, aligning with the broader goals outlined in the WVPP.

In the event of an emergency, including a Workplace Violence Emergency, contact the following:

<b>Responsible Department</b>	<b>WVPP Responsibility(ies)</b>	<b>Phone #</b>	<b>Email</b>
Campus Police	Responsible for emergency response, threat assessment, investigation, and coordination with other departments and outside law enforcement agencies.	760-891-7273 ext. 2289	<a href="mailto:Policedispatchers@palomar.edu">Policedispatchers@palomar.edu</a>

Human Resources	Responsible for investigating allegations of workplace violence and providing all parties with supportive measures.	(760) 744-1150 x2608	<a href="mailto:eeotitleix@palomar.edu">eeotitleix@palomar.edu</a>
Facilities	Responsible for correcting the hazard.	760-744-1150 ext 2629	<a href="mailto:facilitiesremedy@palomar.edu">facilitiesremedy@palomar.edu</a>
Environmental Health & Safety/Risk Management	Responsible for timely reporting to CALOSHA, if applicable.	(760) 744-1150 x2629	<a href="mailto:ehs@palomar.edu">ehs@palomar.edu</a>

## WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by the District to ensure that workplace violence hazards are identified and evaluated.

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.

Workplace violence and hazard inspections will be performed by Campus Police, who will then coordinate next steps and any remedies if needed with appropriate departments and/or supervisors.

Inspections for workplace violence hazard may include but are not limited to assessing the exterior and interior of the workplace for its attractiveness to criminal activity; surveillance measures, such as mirrors and cameras; procedures for reporting suspicious persons or activities; effective location and functioning of emergency buttons and alarms; access to a telephone with an outside line; designated safe area where they can go to in an emergency; etc.

Employees may submit or report a concern of potential hazards by completing a Threat Assessment Form (insert link). The Threat Assessment form will be routed as follows: Supervisor, Campus Police, Facilities, Information Services and/or Human Resources (if applicable).

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of potential risk for workplace violence. Periodic Inspections shall be conducted routinely.

## WORKPLACE VIOLENCE HAZARD CORRECTION

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

-  Corrective action will be tracked through the Facilities remedy. (link to [Threat Assessment form here](#))

## PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, Campus Police or designee will follow post-incident procedures which may include the [District's Emergency Operation Plan \(EOP\)](#) and [Injury Illness & Prevention Plan \(IIPP\)](#):

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.

- Record the findings and ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The workplace violence incident log will be used for every workplace violence incident and will include information, such as:
  - The date, time, and location of the incident.
  - The workplace violence type or types involved in the incident.
  - A detailed description of the incident.
  - A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
  - A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
  - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
  - The type of incident, including, but not limited to, whether it involved any of the following:
    - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
    - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
    - Threat of physical force or threat of the use of a weapon or other object.
    - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
    - Animal attack.
    - Other.
  - Consequences of the incident, including, but not limited to:
    - Whether security or law enforcement was contacted and their response.
    - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
    - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents
- Supportive measures and resources for affected employees.
- Ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

## TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will receive training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises.

Training and instruction will be provided as follows:

- When the WVPP is first established and upon new hire.
- Annually to ensure all employees understand and comply with the plan.
- Whenever a new or previously unrecognized workplace violence hazard has been identified and when



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

The District's WVPP training shall at minimum include the following components:

- The employer's WVPP and the definitions on page 1 of this plan.
- How to obtain a copy of the plan and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer and/or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, preventative and/or corrective measures the District has implemented
- How to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- Opportunities for employees to provide feedback or ask questions with a person knowledgeable about the plan.
- Strategies to avoid/prevent workplace violence and physical harm.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering as outlined in the District's Emergency Operation Plan (EOP) and Building Emergency Procedure (BEP).

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

The District ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by providing unobstructed access through the District's website, which allows an employee to review, print, and email the current version of the written WVPP.

## **RECORDKEEPING**

Palomar Community College District 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 records of workplace violence incident investigations for a minimum of five (5) years. The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

## **EMPLOYEE ACCESS TO RECORDS**

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

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



## REVIEW AND REVISION OF THE WVPP

The District's WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.

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

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

## EMPLOYER REPORTING RESPONSIBILITIES

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

I, Anna Pedroza, Assistant Superintendent/Vice President of Human Resources for the Palomar Community College District hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to promoting a culture of safety and violence prevention in our workplace and believe that these policies and procedures will help us achieve that goal.



Anna Pedroza (Jul 11, 2024 12:53 PDT)

Jul 11, 2024

Anna Pedroza, Assistant Superintendent/Vice President of Human Resources

Date






# PCCD\_WVPP 7.1.2024\_Final

Final Audit Report

2024-07-11

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