

# WORKPLACE VIOLENCE PREVENTION PROGRAM

## Citrus Heights Water District

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

**Date Adopted:** June 18, 2024 by CHWD Board of Directors Resolution 08-2024

**Date of Last Revision(s):**

## 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.

**Authorized Representative** – a person authorized in writing by the employee to take an action described in this plan as an “authorized representative” action. The employee authorization will expire after the authorized action is fulfilled. The District may take reasonable steps to verify the identity of the representative.

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

**Plan** - The workplace violence prevention plan required by LC section 6401.9.

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

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

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

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

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

- The following four workplace violence types:

**Type 1 violence** - Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

**Type 2 violence** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

**Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.

**Type 4 violence** - Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

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

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

## RESPONSIBILITY

The WVPP plan administrators shall be:

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Hilary Straus	General Manager	Overall responsibility for the plan; General Manager approves the final plan and any major changes.	916-725-6873	<a href="mailto:hstraus@chwd.org">hstraus@chwd.org</a>
Brittney Moore	Administrative Services Manager	Responsible for employee involvement and training; Administrative Services Manager updates training materials and handles any reports of workplace violence.	916-735-7711	<a href="mailto:bmoore@chwd.org">bmoore@chwd.org</a>
Kelly R. Drake	Water Efficiency Supervisor/Safety Officer	Responsible for emergency response, hazard identification, and coordination with other employers; Safety Officer conducts safety inspections, coordinates emergency response procedures, organizes safety meetings, and communicates with other employers about the plan.	916-735-7719	<a href="mailto:kdrake@chwd.org">kdrake@chwd.org</a>

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

## 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:

- Management will work with and allow employees and authorized employee representatives to participate in:
  - Identifying, evaluating, and determining corrective measures to prevent workplace violence. Management will have periodic safety meetings with employees and their authorized representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings may involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures. Designing and implementing training. Employees are encouraged to participate in designing and implementing training programs. At the discretion of the plan administrator(s), employee suggestions may be incorporated into the training materials. For example, an employee might suggest a new training scenario based on a recent incident.
  - Reporting and investigating workplace violence incidents as described in Workplace Violence Incident Reporting Procedure below.
- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.

- All employees will follow all workplace violence prevention plan directives, policies, and procedures described in this workplace violence prevention plan, and assist in maintaining a safe work environment.
- 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.

## **EMPLOYEE COMPLIANCE**

Our system ensures that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, and include:

- Training employees, supervisors, and managers in the provisions of the District Workplace Violence Prevention Plan (WVPP).
- Providing 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 by memos/emails of recognition.
- Disciplining employees for failure to comply with the WVPP.

## **COMMUNICATION WITH EMPLOYEES**

We recognize that open, two-way communication between our management team, staff, and other employers, 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:

- The District shall record each yearly WVPP training, and new employee orientation shall include reviewing the most recent WVPP training video.
- Workplace violence prevention training programs.
- Quarterly meetings that address security issues and potential workplace violence hazards.
- Communication between employees and supervisors about workplace violence prevention and violence concerns, without fear of retaliation.
- This WVPP shall be posted on the District website.
- 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 can anonymously report a violent incident, threat, or other violence concerns.
  - Emergency response contacts are listed below in Emergency Response Procedures.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.
- Employees' concerns will be investigated in a timely manner, and they will be informed of the results of the investigation and any corrective actions to be taken, as described below in Procedures for Post Incident Response and Investigation.

## **COORDINATION WITH OTHER EMPLOYERS**

The District will implement the following effective procedures to coordinate implementation of its plan with other employers (such as contractors and consultants) to ensure that those employers and employees understand their

respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.

## WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

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

- Employees must report incidents of workplace violence to a supervisor or plan administrator as soon as the employee is safe. Supervisors must immediately report incidents of workplace violence to a plan administrator as soon as the supervisor is safe. The General Manager and other plan administrator(s) will determine what level of investigation and response is necessary.
- Reporting may be anonymous.

No employee will be subject to, and the District prohibits, any form of discipline or retaliation for reporting perceived violations of workplace violence or cooperating in any way in the investigation of workplace violence. If an employee believes someone has violated this no-retaliation provision, the employee should bring the matter to the immediate attention of a plan administrator. Anyone, regardless of position or title, who the District determines has engaged in conduct that violates this rule against retaliation will be subject to discipline, up to and including termination.

## EMERGENCY RESPONSE PROCEDURES

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

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by alarm systems and PA announcements used to alert employees of emergencies.
- Evacuation and sheltering plans including maps of evacuation routes, locations of emergency exit, and instructions for sheltering in place.
- How to obtain help from staff, security personnel, or law enforcement by contacting those listed in the table below.

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

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Hilary M. Straus	General Manager	Overall responsibility for the plan.	916-725-6873	<a href="mailto:hstraus@chwd.org">hstraus@chwd.org</a>
Police		Enforce the law, protect public order, and protect the public itself. For example, ensuring the safety, health, and possessions of residents, and preventing crime and civil disorder.	911	

# WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The District establishes the following policies and procedures 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 District is made aware of a new or previously unrecognized workplace violence hazard.
- A plan administrator shall review all submitted/reported concerns of potential workplace violence hazards.

## Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic Inspections shall be conducted as specified in the table below.

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

Security Feature	Employee Responsible for Inspection	Inspection Frequency
Concrete giant oranges in front of the lobby to prevent someone from driving through the lobby	Safety Officer	Quarterly
Lobby door chime	Customer Service (CS) staff	Daily as customers come in
Protective glass between customers and employees	Safety Officer	Quarterly
Panic buttons at each customer service desk	Safety Officer, in coordination with local Police Department	Semi-Annual
Office doors have locks	Department Directors	Semi-Annual
Pedestrian gates restrict access to Operations Building doors	Operations Dept. employees	Daily (operated at the start and end of each workday)
One customer service desk has the main unit for the PA system, allowing CS staff to use a walkie-talkie type unit to also access the PA system	Safety Officer	Semi-Annual
All desktop phones have access to PA system that broadcasts both indoors and outdoors	Safety Officer to coordinate with all employees who have an office and desk phone	Semi-Annual
Locked doors leading to all employee-only areas (badge required)	All employees (all badge-locked doors are used daily by staff)	Daily
Locked perimeter gates (employees have gate openers)	All employees (all gates are used daily by staff)	Daily
Security cameras (17 exterior and two in the lobby)	Asst. Water Distribution System Supervisor	Daily
Block walls surrounding the property	Safety Officer	Quarterly

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.
- 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 access to a telephone with an outside line.
- 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 the District'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.
- Other procedures to identify and evaluate workplace violence hazards.

## **WORKPLACE VIOLENCE HAZARD CORRECTION**

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

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation.
- All corrective actions taken will be documented and dated on the record of workplace violence hazard identification, evaluation, and correction form by a plan administrator.
- Corrective measures for workplace violence hazards will be specific to a given work area.

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

After a workplace incident, the WVPP administrator(s) or their designee will implement the following post-incident procedures:

- 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 violent 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.

Ensure that no personal identifying information is recorded or documented in the violent incident log. 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 have 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.
- 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. This additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

The District will provide its employees with training and instruction on the definitions found on page 1 of this plan and:

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures the District has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- 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 the District has for interactive questions and answers with a person knowledgeable about the District plan.

The District will use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.

## **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. The WVPP shall be available on the District's website.

## **RECORDKEEPING**

The 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 violent incident logs for minimum of five (5) years.
- 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 authorized 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 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 incident investigations, workplace hazard identifications, and the violent incident log.
- 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.

## Violent Incident Log

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include:

- The date, time, and location of the incident.
- Workplace violence type or types.
- 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 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.
- The type of incident, including whether it involved any of the following:
  - Physical attack without a weapon.
  - Attack with a weapon or object.
  - Threat of physical force or threat of the use of a weapon or other object.
  - Sexual assault or threat.
  - Animal attack.
- Consequences of the incident, including:
  - 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.

The information that is recorded will be based on:

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

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

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



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Where the incident occurred [For example, in the workplace, parking lot or other area outside the workplace, or other area.]:

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.

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- Were there any injuries? Yes or No. If yes, provide a description of the injuries:

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

Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.

This violent incident log was completed by:

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date