



2024

# Workplace Violence Prevention Plan (WVPP)



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**A. WPPP RECORD OF REVISION**

**RECORD OF REVISION**

<b>Version No.</b>	<b>Section/Pages Affected</b>	<b>Reason for Change</b>	<b>Date Issued</b>	<b>Comments</b>
1	All	Development and Implementation	9/4/24	

## **B. PURPOSE**

The purpose of the WVPP is to ensure that OmniTrans provides employees and members of the public an environment free of threats, intimidation, harassment, and acts of violence.

*California Labor Code Section 6400:*

Requires every employer to furnish a safe and healthful place of employment.

*California Government Code Section 19572:*

Prohibits workplace violence, discourteous treatment, negligence and/or recklessness, and constitutes cause for discipline.

*California Senate Bill 553:*

Requires California employers to establish, implement, and maintain an effective WVPP in all work areas.

The WVPP, a component of the Injury and Illness Prevention Program (IIPP), is intended to establish a framework for protecting employees from workplace violence. This plan includes the following components:

- Persons responsible for implementing the WVPP with their roles clearly defined.
- Effective procedures to obtain the active involvement of employees in implementing the WVPP.
- Methods that will be used to coordinate implementation of the WVPP with other employers, when applicable, to ensure that those employers and employees understand their respective roles, as provided in the WVPP.
- Effective procedures for OmniTrans to accept and respond to reports of workplace violence, and to prohibit retaliation against an employee who makes such a report.
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Effective procedures to communicate with employees regarding workplace violence matters, including, but not limited to, both of the following:
  - How an employee can report a violent incident, threat, or other workplace violence concern to the employer or law enforcement without fear of reprisal.
  - How employees' concerns will be investigated.

- Effective procedures to respond to actual or potential workplace violence emergencies, including, but not limited to the following:
  - Effective means to alert employees of the presence, location, and nature of workplace violence emergencies.
  - Evacuation or sheltering plans that are appropriate and feasible for the worksite.
  - How to request assistance from designated staff for workplace violence emergencies, as well as from security personnel and law enforcement, if available.
- Procedures to develop and provide employee training.
- Procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic inspections to identify unsafe conditions, work practices, employee reports, and concerns. Inspections shall be conducted:
  - When the WVPP is first established
  - After each workplace violence incident
  - Whenever the employer is made aware of a new or previously unrecognized hazard
- Procedures to correct workplace violence hazards identified above, in a timely manner consistent with the IIPP, including procedures for post incident response and investigation.
- Procedures to review the effectiveness of the WVPP including procedures to obtain the active involvement of employees and authorized employee-representatives in reviewing the WVPP.
- Maintain a written log recording incidents of workplace violence.

### **C. POLICY**

OmniTrans will maintain a WVPP conforming to Senate Bill 553 to provide all employees and members of the public with a safe work environment. It shall be the policy of OmniTrans to take appropriate action to protect, as fully as possible, employees and members of the public from acts of violence, threats, intimidation and harassment which may occur at State workplaces, and during the performance of duties. OmniTrans shall also take action, including involving local law enforcement, in pursuing judicial action or other appropriate administrative remedies when such incidents occur.

## D. DEFINITIONS

*Act of Violence* - An act of violence is the attempt (coupled with the ability), or actual use of force of violence with the intent to threaten, harass, intimidate, commit a violent injury, or damage/destroy property.

*Threat* - A threat is a statement (verbal, written or physical) which is intended to intimidate by expressing the intent to either harass, hurt, take the life of another person, or damage/destroy property. This includes threats made in jest, but which others could perceive as serious.

*Harassment* - The creation of a hostile work environment through unwelcome words, actions, or physical contact not resulting in physical harm. Verbal harassment may include disparaging or derogatory comments or slurs, unreasonable or excessive criticism, or name calling.

*Intimidate* - To make afraid; to frighten, alarm, annoy, or scare. To force a person into, or deter them from, some action by inducing fear by, or as if by, threats.

*Stalking* - Stalking occurs when any person willfully, maliciously and repeatedly follows or harasses another and makes a credible threat with the intent to place that person in reasonable fear for his/her safety or the safety of his/her immediate family.

*Workplace* - A workplace shall be anywhere an employee is conducting authorized business, or enroute to and from (excluding normal commute) a location where business is, will be, or has been, conducted.

*Workplace Violence* - The four (4) major types of workplace violence are:

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

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

*Type IV* – 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.

## **E. RESPONSIBILITY**

The Director of Safety & Regulatory Compliance and the Director of Human Resources are responsible for the implementation of the WVPP. A notice to employees shall be posted in work areas with emergency contacts and phone numbers.

**Managers/Supervisors** - Managers and supervisors are responsible for ensuring compliance with the provisions of the WVPP.

**Employee** - Employees are expected to act professionally, courteously, and responsibly at all times, which ensures compliance with the OmniTrans workplace violence policy requirement (Government Code Section 19572). It is the responsibility of every employee to immediately report any and all acts of workplace violence to their supervisor or manager without fear of reprisal. All reports must be taken seriously. The initial verbal report must be followed up with formal documentation which should include the following critical information: names of the involved parties (i.e. perpetrator, victim and witnesses), incident description, time & place of event, and other pertinent details.

## **F. IMPLEMENTATION AND COORDINATION**

OmniTrans is committed to ensuring that all safety and health policies and procedures involving workplace violence prevention are clearly communicated and understood by all employees. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe, healthy and secure work environment. The agency's system of ensuring that all employees, including supervisors and managers, comply with 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, include:

1. Training employees, supervisors, and managers of the provisions of the WVPP when they are hired and periodically through email, team meetings, and training.
2. Evaluating employees to ensure compliance with the WVPP.
3. Recognizing employees who demonstrate work practices that promote the WVPP in the workplace (example: memos of commendation from the director).
4. Providing training and/or Employee Assistance Program services to employees whose compliance is deficient with the WVPP.
5. Disciplining employees for failure to comply with the WVPP up to and including termination.
6. Ensuring proper public notice of the WVPP.

## **G. EMPLOYEE COMMUNICATION**

OmniTrans recognizes that to maintain a safe, healthy and secure workplace it must communicate with all employees, including managers and supervisors, all workplace safety, health and security issues. The communications system is designed to encourage a continuous flow of safety, health and security information between management and employees without fear of reprisal and in a form that is readily understandable.

WVPP policies and procedures will be communicated through:

1. New employee orientation.
2. Conduct periodic reviews of the WVPP with all employees, scheduled on a weekly, monthly, quarterly, or yearly basis depending on the frequency and severity of incidents. These reviews will be communicated through various channels.
3. Training programs designed to address specific aspects of workplace violence prevention and security as applicable to each location.
4. Posting and distributing workplace violence prevention information.
5. Reporting workplace violence/security hazards or threats of violence.
6. Protecting employees who report incidents of workplace violence from retaliation by the person making the threats. Employees who report incidents of workplace violence will be protected from the person making the threats by the agency immediately taking the appropriate actions such as removing the person making the threats from the work area until the situation is resolved or the investigation is completed. For serious threats or acts of violence, Security personnel and/or the local police will be contacted. Emergency phone numbers are posted in work areas.
7. Addressing security issues at Agency Safety Committee meetings.
8. Ensuring proper public notice of the WVPP.
9. The Maintenance Department will use tailgate meetings at the beginning of each shift to disseminate safety/security information to all employees. The same message is read every day for a week, then a new safety/security message is discussed the following week.
10. The Operations Department communicates with Field Supervisors and Dispatchers through emails and weekly operations meetings. Coach Operators will receive communications through the Coach Operators Performance Standards book and the Annual Transit Certificate Renewal (ATCR) program.

### *Incident Reporting Procedures*

1. Call 909-379-7159 and 911 if there is a conflict, emergency, or if someone has been seriously injured.
2. Report any threats or acts of workplace violence to your immediate supervisor or manager or Security Specialist. If that's not possible, report the incidents to the Director of Safety & Regulatory Compliance, or Human Resources.

3. Employees working off property (Stops & Stations, Facilities, Custodians, Road call Mechanics) should call 911 for a conflict or emergency, and then call their supervisor. Coach Operators should call Dispatch or hit the Priority Request to Talk (PRTT).
4. The supervisor or manager should complete an Incident Report and direct it to the Security Specialist, Director of Safety & Regulatory Compliance & Director of Human Resources. Employees can request an electronic copy from the Security Specialist.

## **H. HAZARD ASSESSMENT**

OmniTrans will perform workplace hazard assessment for workplace violence prevention/security concerns in the form of periodic inspections.

Periodic inspections to identify and evaluate workplace violence/security hazards and threats of workplace violence are performed by the Security Specialist.

Periodic inspections are performed according to the following schedule:

1. No less than once a quarter.
2. When the WVPP is implemented.
3. When new, previously unidentified workplace violence/security hazards are recognized.
4. When occupational injuries or threats of injury occur; and whenever workplace conditions warrant an inspection.
5. Within 30 days of a reported incident (follow-up inspection).

Periodic inspections for violence prevention/security hazards consist of identification and evaluation of workplace hazards and changes in business practices and may require assessing for more than one type of workplace violence. The agency performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace hazards.

Inspections for Type I workplace security hazards include assessing:

1. The exterior and interior of the workplace for its attractiveness to robbery or other criminal acts.
2. The need for security surveillance measures, such as mirrors or cameras.
3. Posting signs notifying the public that limited cash is kept on the premises.
4. Procedures for employee response during a robbery or other criminal act.
5. Procedures for reporting suspicious persons or activities.
6. Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.
7. Limiting the amount of cash on hand and using safes for large amounts of cash, or armored car pickup.

8. Building alarm systems and Crime Prevention through Environmental Design including landscaping, lighting, and building design.
9. Other applicable procedures.

Inspections for Type II workplace security hazards include assessing:

1. Access to, and freedom of movement within, the workplace.
2. Adequacy of workplace security systems, such as door locks, security windows, physical barriers, and restraint systems.
3. Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of OmniTrans.
4. Employees' skill in safely handling threatening or hostile service recipients.
5. Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
6. The use of work practices such as "buddy" systems for specified emergency events.
7. The availability of employees' posted escape routes.
8. Other applicable procedures.

Inspections for Type III and IV workplace security hazards include assessing:

1. How well the WVPP has been communicated to employees, supervisors, and managers.
2. How well the agency's management and employees communicate with each other.
3. Employees', supervisors' and managers' knowledge of the warning signs of potential workplace violence.
4. Access to, and freedom of movement within, the workplace by non-employees, including former employees or persons with whom an employee is having a dispute.
5. Frequency and severity of worker reports of incidents of physical or verbal abuse by managers, supervisors or other employees.
6. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
7. Worker progressive disciplinary procedures.
8. Other applicable procedures.

## **I. INCIDENT INVESTIGATIONS**

The following steps will be implemented for investigating incidents of workplace violence:

1. Reviewing all previous incidents.
2. Visiting the scene of an incident as soon as possible.
3. Interviewing involved employees and witnesses.
4. Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
5. Determining the cause of the incident.

6. Taking corrective action to prevent similar incidents from occurring.
7. Recording findings.
8. Obtaining law enforcement reports.
9. Other applicable procedures.

## **J. HAZARD CORRECTION**

Hazards, which threaten the security of employees, shall be corrected based on severity when they are first observed or discovered. As a proactive measure the agency's management has implemented a Customer Code of Conduct.

Corrective measures for Type I workplace security hazards may include:

1. Making the workplace unattractive to robbers and other criminal acts.
2. Utilizing security guards and surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace.
3. Reporting procedures for notifying designated employees of suspicious persons or activities.
4. Posting emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.
5. Posting signs to notify the public that limited cash is kept on the premises.
6. Limiting cash on hand and using time access safes and armored car services for large amounts of cash.
7. Training on emergency action procedures for employees, supervisors and managers.
8. Using alarm systems and access control systems.
9. Applying Crime Prevention through Environmental Design practices.
10. Other applicable procedures.

Corrective measures for Type II workplace security hazards may include:

1. Controlling access to the workplace and freedom of movement within it, consistent with business necessity.
2. Ensuring adequate workplace security/access control systems, such as door locks, security windows, physical barriers, and restraint systems.
3. Providing employee training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of OmniTrans.
4. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
5. Providing procedures for a "buddy" system for specified emergency events.
6. The availability of employees' posted escape routes.
7. Other applicable procedures.

Corrective measures for Type III & IV workplace security hazards may include:

1. Effectively communicating the WVPP to employees, supervisors, and managers.
2. Improving how well the agency's management and employees communicate with each other.
3. Increasing employees', supervisors', and managers' awareness of the warning signs of potential workplace violence.
4. Controlling access to, and freedom of movement within, the workplace by non-employees, including recently discharged employees or persons with whom an employee is having a dispute.
5. Providing counseling to employees, supervisors or managers who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of coworkers.
6. Ensuring all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the aggressor.
7. Ensuring employee disciplinary and discharge procedures address the potential for workplace violence.
8. Applying Crime Prevention measures through Environmental Design and administrative measures including but not limited to:
  - A. Well lighted areas
  - B. Security/controlled access to work area
  - C. Employees must visibly display employee ID badge at all times while in facility
  - D. Code word recognized by coworkers to indicate you need help
  - E. Visitor sign-in
  - F. Visitor badges
  - G. Well lighted parking lots and area surrounding the building
  - H. Buddy system for walking to car or locations away from the building
  - I. Security cameras
  - J. Mounted area mirrors
  - K. On-site security guards
  - L. Eliminate hiding places in areas surrounding the building, i.e. overgrown shrubs, dark areas
  - M. Panic buttons
  - N. Locks on restroom doors
  - O. Remove sharp objects from view that could be used as a weapon (offices with public access)
  - P. Caller ID on phones
  - Q. Field staff check in (cell phones)
  - R. Cash locked in safe or vault.

## **K. EMPLOYEE TRAINING**

All employees, including managers and supervisors, 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 annually thereafter. Training shall also be provided to all new employees, to other employees for whom training has not previously been provided and to all employees, supervisors, and managers given new job assignments for which specific workplace security training for that job assignment has not previously been provided. 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 security training and instruction includes, but is not limited to, the following:

1. Specific WVPP and crime prevention training for the department.
2. Explanation of the WVPP including measures for reporting any violent acts or threats of violence.
3. Recognition of workplace security hazards including the risk factors associated with the three types of workplace violence.
4. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
5. Ways to defuse hostile or threatening situations.
6. Measures to summon others for assistance.
7. The availability of employees' posted escape routes.
8. Notification of law enforcement authorities when a criminal act may have occurred.
9. Emergency medical care to be provided to a victim of any violent act upon a worker.
10. Post-event trauma counseling for those employees desiring such assistance.
11. Specific instructions to all employees regarding workplace security hazards unique to their job assignment, to the extent that such information has not previously been covered in other training.

## **L. RECORD KEEPING**

Records of workplace violence hazard identification, evaluation, and correction will be created and maintained for a minimum of five years. These records will be maintained by the Security Specialist.

Training records will be created and maintained for a minimum of one (1) year and include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions. Training records will be searchable by employee name and/or employee number and a master log will be maintained by Security Department.

Logs of violent incidents will be maintained for a minimum of five (5) years. Records of workplace violence incident investigations will be maintained for a minimum of five (5) years. These records shall not contain “medical information,” as defined in subdivision (j) of Section 56.05 of the Civil Code. All records described above will be made available to employees, upon request and at no cost to the employee, for examination and copying within 15 calendar days of a request. The Security Specialist will be responsible for ensuring that all relevant records are completed and provided to the Director of Safety & Regulatory Compliance and the Director of Human Resources. A safe and healthy workplace is the goal of everyone at OmniTrans with responsibility shared by management and all staff.