

WORKPLACE VIOLENCE PREVENTION PROGRAM

**Copper Mountain College
6162 Rotary Way, Joshua Tree, CA 92252**

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Policy Statement

The **Copper Mountain College** has developed this Workplace Violence Prevention Program to address hazards known to be associated with the four major types of workplace violence as defined by [§Senate Bill 553](#).

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

Copper Mountain College is committed to promoting a safe, respectful, and non-threatening work environment for all employees, students, and members of the public. Intimidating, threatening, and/or potentially violent behaviors are disruptive to Copper Mountain College's objective of a secure and humane atmosphere for its students, employees, and visitors. While it is impossible to eliminate all risks, the following Workplace Violence Prevention Plan is designed to educate members of the Copper Mountain College community (students, employees, and visitors) on how to report alarming/threatening behavior and/or potentially violent acts and how this information will be assessed and analyzed.

Copper Mountain College will also take action, including involving state or local law enforcement, in pursuing prosecution through judicial or other appropriate administrative remedies when such incidents occur.

The guidelines provided in this plan shall apply to all Copper Mountain College students and employees as well as visitors on Copper Mountain College operated grounds. These guidelines also apply to activities and events that occur on Copper Mountain College owned and/or controlled property, buildings, premises, facilities, etc., and to activities and events, regardless of the location, sponsored by Copper Mountain College.

These guidelines are not intended to be a set of inflexible requirements, nor are they intended to limit the appropriate discretion of officials as warranted by the specific circumstances of a particular individual/incident.

These guidelines do not provide for adjudication of misconduct by, discipline of, or imposition of sanctions on Copper Mountain College employees, students, or visitors. Such action may be taken against individuals whose behavior is addressed under these guidelines pursuant to Copper Mountain College's employee or student disciplinary policies and procedures as well as applicable federal, state, or local laws. This Workplace Violence Prevention Program does not have the force and effect of law.

Roles & Responsibilities

Workplace Violence Prevention Program Administrator

Director of Facilities and Operations is responsible for ensuring compliance and addressing complaints with the provisions of the Workplace Violence Prevention Program. The administrator must take immediate action when employees or students have made him/her aware of a perceived threat, and/or act of violence.

Employees

Copper Mountain College employees are expected to act professionally, courteously, and responsibly at all times, which ensures compliance with Copper Mountain College's workplace violence prevention plan. It is the responsibility of each and every employee to immediately report any and all acts of workplace violence to their supervisor or manager without fear of reprisal.

Copper Mountain College employees are urged to be alert for any behavior that presents a threat of violence. Further, Copper Mountain College employees should be familiar with these guidelines and with the methods for reporting actual or potential threats to the Copper Mountain College community.

All reports must be taken seriously. The initial verbal report must be followed up with written documentation, which should include, but not limited to the following critical information:

- Date of Incident
- Workplace Violence Incident Type
- Time of Incident
- Location of Incident
- Location Classification
- Who Committed the Violence
- Employee Circumstances
- Description of Incident
- Type of Incident

Copper Mountain College Risk Management Office

Copper Mountain College Risk Management assists with the periodic evaluation of the site's Workplace Violence Prevention Program to determine the location's compliance with the program's elements. The office will request documents from the site to review the division's capability to satisfy the program's requirements.

Communication

Copper Mountain College recognizes that to maintain a safe, healthy, and secure workplace Copper Mountain College must communicate to all employees, including managers and supervisors, all workplace safety, health, and security issues. Copper Mountain College has a communication system 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. Copper Mountain College will communicate the Workplace Violence Prevention Program policies and procedures:

- At the time of hire and annually thereafter the Workplace Violence Prevention Program should be reviewed with all employees.
- Provide training designed to address specific aspects of workplace violence prevention and security unique to each of Copper Mountain College's operating locations.
- Posting and distributing workplace violence prevention information.
- Reporting processes for workplace violence/security hazards or threats of violence.
- Copper Mountain College will promptly take the appropriate actions investigating threats in the work area until the situation is resolved. For serious threats or acts of violence, security and/or the local police will be called.
- Addressing safety concerns at Copper Mountain College's safety & facility committee meetings. Active involvement of employees and authorized employee representatives in reviewing the plan will occur at these meetings.

Reporting

All acts or threats of violence against a Copper Mountain College employee, service provider, or student, regardless of the source of the act or threat, will be reported promptly and accurately regardless of whether or not physical injury has occurred. The following additional practices ensure employee compliance with workplace, policies, and procedures:

- Immediately report any situation or incident that generates a sense of fear for personal safety or the safety of others to CMC Security.
- If the reporting individual is an employee, the incident will also be reported to his or her supervisor as soon as possible. In situations where an employee is unable to report the matter to their supervisor, the report can be made to Human Resources.
- Security or Human Resources staff will immediately provide the reporting individual with a copy of the Incident Report and ask him or her to complete it.
- Anyone involved in a violent attack or who witnesses an attack resulting in an injury that requires more than first aid will contact emergency services.
- Injured persons will receive prompt and appropriate medical care and be transported to medical care facilities.
- The incident will be reported to police and other authorities as required by law.
- The area where the violent actions occurred will be secured to protect evidence and minimize any disturbance during the post-incident response process.
- An Incident Report will be prepared.

- Injured persons, witnesses to the incident, and other affected employees will be provided psychological assistance and counseling to reduce trauma and stress.

Workplace Violence Emergencies

Employees may be alerted to workplace violence in a variety of ways including direct communication, email, phone calls, text messages, alarms, announcements of public address systems, or other methods.

Employees should activate our emergency response plan and be ready to shelter in place or evacuate. Employees should follow district protocols.

Information about the exact location, presence, and nature of the incident will be communicated as information is obtained through the various communication channels listed above. Understand that unannounced imminent threats may have no warning and information may be highly limited.

- In the event that you need immediate assistance, contact security or law enforcement by dialing 9-1-1. For non-imminent assistance, you should contact human resources.

Hazard Assessment

Copper Mountain College will perform a workplace hazard assessment for workplace hazards in the form of periodic inspections. Periodic inspections to identify unsafe conditions, work practices and threats of workplace violence are performed by onsite administration.

Periodic inspections are performed according to the following schedule:

1. Annually
2. When the Workplace Violence Prevention Program is implemented
3. When new, previously unidentified security hazards are recognized
4. When occupational injuries or threats of injury occur
5. Whenever workplace security conditions warrant an inspection

Periodic inspections for security hazards consist of the identification and evaluation of workplace security hazards and changes in employee work practices and may require assessing for more than one type of workplace violence. Copper Mountain College performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace hazards.

Type I Workplace Violence Inspections. Inspections for Type I workplace hazards include assessing:

1. The exterior and interior of the workplace for its attractiveness to bad actors;
2. The need for security surveillance measures, such as mirrors or cameras;
3. Procedures for employee response during a robbery or other criminal act;
4. Procedures for reporting suspicious persons or activities;
5. Posting of emergency telephone numbers for law enforcement and fire and medical services where employees have access to a telephone with an outside line;

Type II Workplace Violence Inspections. 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, and physical barriers;
3. Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of Copper Mountain College;
4. Employee's skills 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 availability of employee evacuation routes

Type III & IV Workplace Inspections. Inspections for Type III & IV workplace security hazards include assessing:

1. Copper Mountain College's communication with employees, supervisors, and managers;
2. Copper Mountain College employees', supervisors' and managers' knowledge of the warning signs of potential workplace violence;
3. Access to, and freedom of movement within the workplace by non-employees, including former employees or persons with whom one of Copper Mountain College's employees is having a dispute;
4. Frequency and severity of employee reports of threats of physical or verbal abuse by managers, supervisors, or other employees;
5. Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace;
6. Employee disciplinary and termination procedures

Hazard Correction

Hazards that threaten the security of employees will be corrected in a timely manner based on severity when they are first observed or discovered.

Type I workplace violence. Corrective measures for Type I workplace security hazards include:

1. Making the workplace unattractive to criminal acts;
2. Utilizing surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace;
3. Procedures for the reporting of suspicious persons or activities;
4. Posting emergency telephone numbers for law enforcement and fire and medical services where employees have access to a telephone with an outside line;
5. Employee, supervisor, and management training on emergency action procedures

Type II workplace violence. Corrective measures for Type II workplace security hazards include:

1. Controlling access to the workplace and freedom of movement within it, consistent with business necessity;
2. Ensuring the adequacy of workplace security 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 Copper Mountain College;
4. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons;
5. Ensuring adequate emergency evacuation routes

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

1. Effectively communicating Copper Mountain College's antiviolenence policy to all employees, supervisors, or managers;
2. Improving how well Copper Mountain College's management and employees communicate with each other;
3. Increasing awareness by employees, supervisors, and managers 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 one of Copper Mountain College's employees is having a dispute;
5. Providing counseling to employees, supervisors, or managers who exhibit behavior that represents strain or pressure that 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 person making the threat;
7. Filing of Workplace Violence Restraining Orders (WVRO) as necessary;
8. Ensuring employee disciplinary and discharge procedures address the potential for workplace violence; *and*
9. Applying crime prevention measures through environmental design and administrative measures including but not limited to:
 - A. Well-lit areas
 - B. Security/controlled access to work area
 - C. Employees must visibly display employee ID badge at all times while in a Copper Mountain College facility
 - D. Well-lit parking lots and the area surrounding the building.
 - E. Buddy system for walking to car or locations away from the building

- F. Security cameras
- G. Mounted area mirrors
- H. Onsite security guards
- I. Eliminate hiding places in areas surrounding the building, i.e., overgrown shrubs, dark areas.
- J. Locks on restroom doors
- K. Remove sharp objects from view that could be used as a weapon
- L. Caller ID on district phone system
- M. Field staff check in (cell phones)

Incident Investigations

Copper Mountain College has established the following procedures for investigating incidents of workplace violence that include threats and physical injury:

1. Review all previous incidents.
2. Visit the scene of an incident as soon as possible.
3. Interview threatened or injured employees and witnesses.
4. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
5. Determine the cause of the incident.
6. Take corrective action to prevent the incident from recurring.
7. Record the findings and corrective actions taken.
8. Consider if a Workplace Violence Restraining Order (WVRO) will be needed.
9. Review the corrective measures and outcome of the investigation with reporting parties and victims of workplace violence.

Training and Instruction

Copper Mountain College has established the following policy on training all employees with respect to workplace security.

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace safety/security practices. Training and instruction will be provided when the Workplace Violence Prevention program is first established and annually thereafter.

Training will also be provided to all new employees and 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 safety and security training for that job assignment has not previously been provided.

Additional training and instruction will be provided to all personnel whenever Copper Mountain College is made aware of new or previously unrecognized safety and security hazards.

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

1. Overview of the Workplace Violence Prevention Plan and associated terminology.
2. Recognition of workplace violence hazards specific to job duties, the implementation of corrective measures, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
3. How to report workplace violence incidents or concerns to law enforcement without fear of reprisal.
4. Measures to prevent workplace violence, including procedures for reporting workplace safety and security hazards or threats of violence to managers and supervisors.

Review of this Plan

The plan and the incident log shall be reviewed annually and shall allow for the inclusion of employee input, and authorized employee representatives (union representatives). The plan shall also be reviewed following workplace violence incidents and when deficiencies are observed, reported, and the like.

Active Involvement

Employee involvement is appreciated and often better suited to correcting hazards in the workplace due to the intimate knowledge of the location and operation. Employee and authorized representatives may participate in plan development, hazard correction, and identifying, evaluating, and implementing of the plan in a variety of methods including:

- Participating with the safety committee
- Submitting concerns
- Submitting feedback for the annual review
- Expressing interest in serving on the workplace violence annual review committee

Recordkeeping

Copper Mountain College has established the following recordkeeping policies:

1. Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for a minimum of five years.
2. Training records will be maintained for a minimum of one 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.
3. Violent incident logs will be maintained for a minimum of five years.
4. Records of workplace violence incident investigations will be maintained for a minimum of five years. These records shall not contain "medical information" as defined by Civil Code Section 56.05(j).

Definitions

For the purpose of this section, the following definitions apply:

1. **“Emergency”** refers to unanticipated circumstances that can be life-threatening or pose a risk of significant injuries to employees or other individuals.
2. **“Engineering controls”** denote an aspect of the built space or a device designed to eliminate a hazard from the workplace or establish a barrier between the worker and the hazard.
3. **“Log”** signifies the violent incident log mandated by this section.
4. **“Plan”** signifies the workplace violence prevention plan required by this section.
5. **“Threat of violence”** encompasses 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 is reasonably perceived to convey an intent, to cause physical harm or instill fear of physical harm in someone, and that serves no legitimate purpose.
6. **“Workplace violence”** encompasses any act of violence or threat of violence occurring in a place of employment. “Workplace violence” excludes lawful acts of self-defense or defense of others.
7. **“Workplace violence”** includes, but is not limited to, the following:
 - The threat or use of physical force against an employee resulting in, or having 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,” indicating workplace violence committed by a person with no legitimate business at the worksite, including violent acts by anyone entering the workplace or approaching workers with the intent to commit a crime.

“Type 2 violence,” denoting workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

“Type 3 violence,” refers to workplace violence against an employee by a present or former employee, supervisor, or manager.

“Type 4 violence,” signifying 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.