

DATE SUBMITTED 08/06/2024
 SUBMITTED BY Kristen Smith
 DATE ACTION REQUIRED 09/04/2024

COUNCIL ACTION (X)
 PUBLIC HEARING REQUIRED ()
 RESOLUTION ()
 ORDINANCE 1ST READING ()
 ORDINANCE 2ND READING ()
 CITY CLERK'S INITIALS ()

**IMPERIAL CITY COUNCIL
 AGENDA ITEM**

SUBJECT: DISCUSSION/ACTION: 1. Approval and adoption of the Workplace Violence Prevention Plan (WVPP).	
DEPARTMENT INVOLVED: Human Resources	
BACKGROUND/SUMMARY: The City of Imperial is requesting the Council's consideration in the adoption of the Workplace Violence Prevention Plan (WVPP). The purpose of the plan is to prevent violence in our workplace and is mandated by OSHA for all workplaces to establish and implement one. The plan provisions apply to all city staff.	
FISCAL IMPACT: NOT TO EXCEED There is no fiscal impact associated with this action.	FINANCE INITIALS <u>JMS</u>
STAFF RECOMMENDATION: Recommendation to approve and adopt the Workplace Violence Prevention Plan (WVPP).	DEPT. INITIALS <u>KWS</u>
MANAGER'S RECOMMENDATION: Approve Staff Recommendation	CITY MANAGER'S INITIALS <u>OTM</u>
MOTION:	
SECONDED: AYES: NAYES: ABSENT:	APPROVED () REJECTED () DISAPPROVED () DEFERRED () REFERRED TO:

POLICY NAME: Workplace Violence Prevention Plan (WVPP)	AUTHORITY: City of Imperial
APPLICATION: All Employees	DATE APPROVED: Pending CC Approval City Council Agenda Item – September 4, 2024



CITY OF IMPERIAL
WORKPLACE VIOLENCE PREVENTION PLAN
(WVPP)

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I. Purpose

The purpose of the City of Imperial's Workplace Violence Prevention Plan ("Plan" or "WVPP") is to establish, implement, and maintain an effective workplace violence prevention plan as required under Labor Code sections 6401.7 and 6401.9.

Specifically, this Plan contains procedures to address the following statutory requirements:

- 1) Record information in a Violent Incident Log for every incident of Workplace Violence, as defined below.
- 2) Provide effective training to employees on the legal requirements related to the prevention of workplace violence, including but not limited to the City of Imperial's WVPP.
- 3) Maintain records of the following: (a) Workplace Violence hazards, (b) City of Imperial employee (hereinafter referred to as "employees") trainings, (c) Violent Incident Logs, and (d) the investigation of any incident of Workplace Violence.
- 4) Ensure certain records are made available to the Division of Occupational Safety and Health ("Division" or "DOSH"), employees, and any authorized employee representatives.

II. Scope of Coverage

a. Workplaces

The WVPP shall apply to all City of Imperial workplaces, unless a workplace is expressly exempted from coverage.

The following workplaces are exempt from and not subject to the WVPP:

- 1) A workplace that an employee has chosen to telework from that is not under the control of the City of Imperial.

b. Employees

The WVPP applies to all City of Imperial employees, unless an employee is expressly exempted.

The following employees are exempt from coverage under the WVPP:



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- 1) An employee who is teleworking from a location of the employee's choice, which is not under the control of the City of Imperial.

III. Effective Date

The effective date of this Plan is July 1, 2024.

The Plan shall continue in full force and effect until repealed or rescinded.

IV. Definitions

For the purposes of the WVPP, the following definitions apply:

- "Access" means the right and opportunity to examine and receive a copy of the WVPP.
- "Designated Representative" means any individual or organization to whom an employee gives Written Authorization to exercise a right of Access. A recognized or certified collective bargaining agent shall be considered a Designated Representative for the purpose of Access to the WVPP.
- "Emergency" or "Emergencies" means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
- "Engineering Controls" mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.
- "Serious Injury or Illness" means 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" means 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.



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- “Workplace Violence” means any act of violence or Threat of Violence that occurs in the City of Imperial’s covered workplace. Workplace Violence does not include lawful acts of self-defense or defense of others.
- Workplace Violence includes but is not limited to the following:
 - 1) 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.
 - 2) 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.
 - 3) The following four (4) types of Workplace Violence:
 - “Type 1 violence” means Workplace Violence committed by a person who has no legitimate business at the workplace and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
 - “Type 2 violence” means Workplace Violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 - “Type 3 violence” means Workplace Violence against an employee by a present or former employee, supervisor, or manager.
 - Type 4 violence” 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.
- Workplace Violence Prevention Committee (“Committee”) means the group of employees who assess City of Imperial’s Workplace Violence hazards and support in the implementation of the WVPP.
- Workplace Violence Prevention Coordinators (“Coordinators”) means the individuals who are responsible for implementing the WVPP.
- “Work Practice Controls” means procedures and rules, which are used to effectively reduce Workplace Violence hazards.



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- “Written Authorization” means a request provided to the City of Imperial containing the following information:
 - 1) The name and signature of the employee authorizing a representative of the employee to access the WVPP on the employee’s behalf;
 - 2) The date of the request;
 - 3) The name of the designated representative (individual or organization) authorized to receive the WVPP on the employee’s behalf; and
 - 4) The date upon which the Written Authorization will expire, if less than one (1) year.
- “WVPP” or “Plan” means the Workplace Violence Prevention Plan.
- “Violent Incident Log” or “Log” means the violent incident log required by this WVPP.

V. The Plan

a. Access

The City of Imperial makes the WVPP available and accessible to employees, Designated Representatives, and representatives of the DOSH at all times.

1) Employees

The City of Imperial will provide Access to the WVPP to employees as follows:

- 1) The City of Imperial has made and will continue to make the WVPP available and will provide Access to employees by providing an employee a physical copy of the WVPP within five (5) business days of receiving the request for Access from the employee.

Whenever an employee requests a copy of the WVPP, the City of Imperial shall provide the requesting employee a printed copy of the WVPP, unless the employee agrees to receive an electronic copy of the WVPP.

The City of Imperial will provide one (1) printed copy of the WVPP free of charge. If an employee requests additional copies of the WVPP within one (1) year of the



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previous request and the WVPP has not been updated with new information since the prior copy was provided, the City of Imperial may charge reasonable, non-discriminatory reproduction costs for the additional copies.

- 2) An employee can Access the WVPP through the City of Imperial’s Intranet <https://www.cityofimperial.org/user/login>, where the employee can review, print, and email the current version of the WVPP.

2) Designated Representatives

The City of Imperial will make the WVPP available and provide Access to Designated Representatives in a manner consistent with Section V(a)(1) of the City of Imperial’s WVPP only after the employee provides Written Authorization to the City of Imperial, unless otherwise stated.

The City of Imperial makes the WVPP available and provides Access to any employee organization that represents employees in a manner consistent with WVPP Section V(a)(1) without requiring that an employee provide prior Written Authorization to the City of Imperial.

3) DOSH Representatives

The City of Imperial will make the WVPP available to DOSH representatives upon request.

b. Implementation

1) Workplace Violence Prevention Coordinators (“Coordinators”)

The individual(s) identified below shall serve as the City of Imperial’s Workplace Violence Prevention Coordinators (“Coordinators”) and are authorized to and responsible for the WVPP as follows:

Coordinator	Job Title/Position	Contact Information	WVPP Responsibilities
Implementation Coordinator	Human Resources Manager	HR Department Main # (760)355-3807	<i>Responsible for implementing the plan.</i>
Hazard and Emergency Response Coordinator	Human Resources Manager	HR Department Main # (760)355-3807	<i>Responsible for Emergency response, hazard response, and coordination with other employers.</i>



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Prevention Coordinator	Human Resources Analyst	HR Department Main # (760)355-3807	<i>Responsible for hazard identification and coordination with other employers.</i>
Training Coordinator	Human Resources Analyst	HR Department Main # (760)355-3807	<i>Responsible for training and employee involvement.</i>

Specifically, the **Implementation Coordinator** will be responsible for the following:

- 1) Serve as the Chair of the City of Imperial’s Workplace Violence Prevention Committee (“Committee”).

Specifically, the **Hazard and Emergency Response Coordinator** will be responsible for the following:

- 1) Respond to reports of Workplace Violence incidents and Workplace Violence hazards, including investigating incidents of Workplace Violence and Workplace Violence hazards.

Specifically, the **Prevention Coordinator** will be responsible for the following:

- 1) Establish and coordinate Work Practice Controls;
- 2) Establish and coordinate Engineering Controls.

Specifically, the **Training Coordinator** will be responsible for the following:

- 1) Coordinate employee training and employee involvement in training.

2) Workplace Violence Prevention Committee (“Committee”)

The City of Imperial established a Workplace Violence Prevention Committee (“Committee”) to assess the City of Imperial’s Workplace Violence hazards and determine preventative actions to be taken.

The Committee shall be comprised of all the Coordinators and department heads. In addition, each department will appoint one designated employee to attend the Committee.

The Committee shall undertake the following:

- 1) Meet regularly, but not less than quarterly;
- 2) Prepare and make available to any affected employees, the records of the



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workplace violence issues discussed at the Committee meetings and maintained for review by DOSH upon request;

- 3) Review the results of the City of Imperial's periodic, scheduled workplace inspections;
- 4) Review investigations of Workplace Violence and their causes, and where appropriate, submit suggestions to the City of Imperial's management for the prevention of future incidents;
- 5) Review investigations of alleged Workplace Violence hazards brought to the attention of any Committee member. When determined necessary by the Committee, the Committee may conduct its own inspection and investigation to assist in remedial solution(s);
- 6) Submit recommendations to assist in the evaluation of employee safety suggestions;
- 7) Upon request from the DOSH, verify abatement action taken by the City of Imperial to abate citations issued by the DOSH;
- 8) Provide updates to the WVPP;
- 9) Prepare and implement Workplace Violence training subsequent to the initial training; and
- 10) At minimum, review the WVPP under the following circumstances: (a) once annually; (b) when a deficiency is observed or becomes apparent; and (c) after a Workplace Violence incident.
 - a) A review of the WVPP should include the following: (a) review of the Violent Incident Log; (b) review employee comments and feedback on the WVPP; (c) review of other records; and (d) a physical inspection of the workplace.
 - b) Following the review, report any revisions to the Plan to employees.

c. Obtaining Active Employee Involvement in Developing and Implementing the Plan

The City of Imperial encourages the active involvement of employees in developing and implementing the WVPP through and by the measures discussed in the sections below.

Additionally, the City of Imperial encourages the active involvement of employee



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representatives in developing and implementing the WVPP through providing any feedback on the WVPP prior to its implementation and anytime there are significant updates to the WVPP.

1) Identifying, Evaluating, and Correcting Workplace Violence Hazards

The City of Imperial encourages the active involvement of employees in identifying, evaluating, and correcting Workplace Violence hazards through and by the following means:

- 1) Regular meetings of the Committee comprised of both the City of Imperial department heads, Coordinators and designated employees that are charged with identifying, evaluating, and correcting Workplace Violence hazards;
- 2) Provide a means by which employees may provide anonymous feedback regarding the identification, evaluation, and correction of any Workplace Violence hazards; and
- 3) Provide a means by which employees may report potential Workplace Violence hazards that the City of Imperial will evaluate and, if necessary, correct.

2) Designing and Implementing Training

The City of Imperial encourages the active involvement of employees in designing and implementing training through and by the following means:

- 1) Regular meetings of the Committee comprised of both the City of Imperial department heads, Coordinators and designated employees that are charged with designing and implementing training;
- 2) Authorize sufficient time and resources to facilitate employee participation, including holding trainings during regular working hours; and
- 3) Establish surveys to evaluate the effectiveness of the training, and authorize sufficient time and resources following each training to ensure employees can complete the evaluation.

3) Reporting and Investigating Workplace Violence Incidents

The City of Imperial encourages the active involvement of employees in reporting and investigating Workplace Violence incidents through and by the following means:



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- 1) Regular meetings of the Committee comprised of both the City of Imperial department heads, Coordinators and designated employees that are charged with reviewing investigations of Workplace Violence incidents and hazards;
- 2) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern in which there is an immediate threat to the employee's safety or the safety of others or where a Serious Injury or Illness has occurred to immediately report the incident by calling 911 to request emergency assistance from law enforcement, and/or emergency medical services;
- 3) Encourage any employee who experiences, witnesses, or becomes aware of a violent incident, threat, or other Workplace Violence concern to immediately report the facts and circumstances of the violent incident, threat, or other Workplace Violence concern through the STOPit platform, or if an employee is not able to report through the STOPit platform, an employee may report directly to the Human Resources Department in writing;
- 4) Implement procedures to ensure that employees are not retaliated against for reporting or participating in investigations of Workplace Violence incidents;
- 5) Allocate adequate resources and training for employees to appropriately recognize Workplace Violence concerns; and
- 6) Provide coverage, if necessary, so employees can immediately report a concern of Workplace Violence during their regularly scheduled work hours and participate in investigations.

d. Coordination with Other Employers

If and when applicable (e.g., for multi-employer workplaces), the City of Imperial shall coordinate the implementation of the Plan with other employers in order to ensure that those employers and employees understand their respective roles, as provided in the Plan.

Specifically, the City of Imperial will coordinate with other employers to ensure that all employees within the workplace are trained on Workplace Violence prevention and all Workplace Violence incidents involving any employee are reported, investigated, and recorded.

At a multiemployer worksite, the City of Imperial will ensure that when an employee experiences a Workplace Violence incident, the City of Imperial shall record the information in the Violent Incident Log and provide a copy of that Log to the controlling



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employer. If the City of Imperial is the controlling employer at a worksite, the City of Imperial will ensure that it receives copies of all Logs from other employers.

e. Compliance

The City of Imperial will ensure compliance with the Plan through and by the measures discussed in this section.

1) Expectations of Employees Regarding Compliance with the Plan

A. Employees

All employees should be familiar with the WVPP and its requirements.

All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting the City of Imperial maintain a safe and secure work environment.

All employees are required to know, understand, and adhere to the safety rules that apply to their workplace and the work they perform.

B. Managers and Supervisors

Managers and supervisors are responsible for implementing and maintaining the WVPP in their respective work areas and for ensuring that all employees adhere to the safety rules that apply in these work areas.

Managers and supervisors should answer questions that employees may have about the Plan and its requirements, be able to direct employees to the Coordinators, or provide resources for employees to use that will answer their questions.

2) Methods to Ensure Compliance

A. Training and Retraining of Employees on Plan Requirements

The City of Imperial shall ensure substantial compliance with the WVPP by providing employees with training as discussed in the Plan.

B. Enforcement of the Plan Requirements and Discipline for Non-Compliance

Managers and supervisors will enforce the rules and requirements related to the Plan



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fairly and uniformly.

Employees who do not comply with the safety rules and requirements set forth in the Plan may be subject to discipline, up to and including termination.

Managers and supervisors who do not enforce the rules and requirements related to the Plan or do not enforce them fairly and uniformly may be subject to discipline, up to and including termination.

f. Communicating to Employees about Workplace Violence

The City of Imperial will communicate to employees about reporting and investigating Workplace Violence incidents.

The City of Imperial's procedures for communicating to employees regarding Workplace Violence incidents include the following:

- 1) Reporting on violent incidents, threats, or other violent Workplace Violence concerns;
- 2) Informing affected employees of the general results of any investigation into Workplace Violence incidents, while protecting the privacy of affected and/or involved employees;
- 3) Informing affected employees of the corrective actions taken in response to the Workplace Violence incident, while protecting the privacy of affected and/or involved employees; and
- 4) Communicating to employees about the prohibition on retaliating against employees who participate in the investigation of Workplace Violence incidents.

1) Reporting Violent Incidents

An employee may report a Workplace Violence incident through any of the following means:

- 1) Reporting the incident through the STOPit platform;
- 2) In the case in which an employee is not able to report through the STOPit platform, an employee may report the incident directly to the Human Resources Department in writing. Reports submitted directly to the Human Resources Department in writing will either be accepted via email or by hand delivering a signed and dated written report to a Human Resources staff member.



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- 3) In the case of a Workplace Violence Emergency, an employee should promptly call 911 to report the incident in order to request emergency assistance from law enforcement and/or emergency medical services.

2) Acceptance of and Response to Reports of Workplace Violence

The City of Imperial shall accept and respond to all reports of Workplace Violence.

A. Immediate Response

Immediately following a report of Workplace Violence, the City of Imperial shall immediately respond by providing first aid and emergency care to the injured employee(s) and by taking any measures necessary to prevent other employees from being injured.

The City of Imperial will ensure that any injured employees receive prompt medical evaluation and treatment and that injured employees are provided transportation to receive medical care, if such care is not provided on site.

The City of Imperial will immediately report to DOSH any Serious Injury or Illness or death of an employee that is attributable to Workplace Violence.

B. Investigating the Report of Workplace Violence

The City of Imperial shall investigate reports of Workplace Violence as provided in the following section.

C. No Retaliation

The City of Imperial shall not take adverse action against any employee who reports Workplace Violence or who participates in any investigation of Workplace Violence based on such conduct.

D. Provision of Leave for Employees Who are or May be Victims of Violence

The City of Imperial shall not take adverse action against any employee who takes time off from work in order to seek a Temporary Restraining Order ("TRO") or to obtain other assistance to help safeguard the "health, safety, or welfare" of the employee or their child based on such conduct. An employee may use paid sick to take time off from work for these purposes.

An employee shall provide the City of Imperial reasonable and advance notice of their



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intention to take time off from work for either of these purposes if feasible. If advance notice is not feasible, employees must provide a certification to the employer within a reasonable time after the absence.

E. Temporary Restraining Orders

When an employee has suffered unlawful violence or a credible Threat of Violence from any individual, which may reasonably be carried out at any of the City of Imperial's workplaces, the City of Imperial may attempt to obtain a TRO on behalf of the employee.

3) Investigation of Workplace Violence

The City of Imperial shall respond to reports of Workplace Violence or a Threat of Violence by promptly initiating an investigation, as applicable.

The City of Imperial's investigation of Workplace Violence or a Threat of Violence may include, but not necessarily be limited to, the following steps or measures, as applicable:

- 1) Visiting the scene of an incident as soon as safe and practicable;
- 2) Collection of facts on who, what, when, where, and how the incident occurred;
- 3) Collection of statements from involved parties, such as employees, witnesses, and/or law enforcement;
- 4) Reviewing security footage of existing security cameras if applicable;
- 5) Collection of photographic or video evidence of damage or injuries, where appropriate;
- 6) Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator;
- 7) Consultation with the affected employees, witnesses, and Committee members to identify potential contributing causes;
- 8) Obtaining any reports completed by law enforcement;
- 9) Assessment of any Threat of Violence, identifying the following, as applicable and to the extent the information is known by the City of Imperial:
 - a) The exact nature and context of the threat and/or threatening behavior;



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- b) The identified target;
- c) The person's apparent motivation;
- d) The person's ability to carry out the threat; and
- e) The person's background, including work history, criminal record, mental health history, and past behavior on the job.

Following an investigation, the City of Imperial may take the following measures, as applicable:

- 1) Notify the affected employees of the general results of the investigation, while protecting the privacy of affected and/or involved employees;
- 2) Collaborate with the Committee to recommend corrective action;
- 3) Implement changes in Engineering Controls, procedures, or policies, if appropriate; and/or
- 4) Establish updated Work Practice Controls, if necessary.

The City of Imperial shall retain records of Workplace Violence incident investigations for a minimum of five (5) years.

4) Documentation in Violent Incident Log

All Workplace Violence incidents shall be subsequently reported in the Violent Incident Log. Information that is recorded in the Log for each incident shall be based on information solicited from the employees who experienced the Workplace Violence, on witness statements, and on investigation findings. The City of Imperial shall omit from the Log any element of personal identifying information that would be sufficient to allow identification of any person involved in a Workplace Violence incident.

The information recorded in the Log shall include all of the following:

- 2) The date, time, and location of the incident;
- 3) The Workplace Violence type or types (e.g., Type 1, Type 2, Type 3, or Type 4);
- 4) A detailed description of the incident;



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- 5) A classification of who committed the Workplace Violence, including whether the perpetrator was:
 - a) A client or customer;
 - b) Family or friend of a client or customer;
 - c) Stranger with criminal intent;
 - d) Coworker;
 - e) Supervisor or manager;
 - f) Partner or spouse;
 - g) Parent or relative; or
 - h) Other perpetrator;

- 6) A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was:
 - a) Completing usual job duties;
 - b) Working in poorly lit areas;
 - c) Rushed;
 - d) Working during a low staffing level;
 - e) Isolated or alone;
 - f) Unable to get help or assistance;
 - g) Working in a community setting; or
 - h) Working in an unfamiliar or new location.

- 6) A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area;

- 7) The type of incident, including, but not limited to, whether it involved any of the following:



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- a) Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting;
 - b) Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object;
 - c) Threat of physical force or threat of the use of a weapon or other object;
 - d) Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact;
 - e) Animal attack; or
 - f) Other;
- 8) Consequences of the incident, including, but not limited to:
- a) Whether law enforcement was contacted and their response;
 - b) Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident;
- 9) Information about the person completing the Log, including their name, job title, and the date completed.

5) Prohibition on Retaliation

The City of Imperial has implemented the following measures to prevent and prohibit retaliation against those who report Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or who participate in the investigation of such incidents or hazards:

- 1) The City of Imperial responds to reports of Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence in a prompt and timely manner;
- 2) The City of Imperial provides employees with the option to report incidents, hazards, or concerns, anonymously through the STOPit platform;
- 3) The City of Imperial admonishes managers and supervisors not to retaliate against any employee who reports Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or any employee who participates in the



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investigation of such incidents or hazards; and

- 4) The City of Imperial trains all employees that retaliation against any employee who reports Workplace Violence, a Threat of Violence, or hazards related to Workplace Violence, or any employee who participates in the investigation of such incidents or hazards is expressly prohibited and that there are consequences, such as discipline, for retaliation against such employees.

g. Identification, Evaluation, and Correction of Workplace Violence Hazards

The City of Imperial shall undertake all necessary actions to identify, evaluate, and correct Workplace Violence hazards.

1) Identification of Workplace Violence Hazards

The City of Imperial shall undertake all necessary actions to identify Workplace Violence hazards.

The City of Imperial shall conduct inspections of its workplace(s) to identify Workplace Violence hazards.

Specifically, the City of Imperial shall conduct inspections under the following circumstances:

- 1) When the WVPP is first established;
- 2) After each Workplace Violence incident;
- 3) Whenever the City of Imperial is made aware of a new or previously unrecognized hazard; and
- 4) Every year.

Periodic inspections to identify and evaluate Workplace Violence and hazards will be performed by the following employees in the following areas of the workplace:



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Name of Employee/Job Title of Employee	Inspection Area/Department/Specific Location
Designated committee member(s) that the Committee agrees to send to each periodic inspection	City Hall Community Development Library Parks and Recreation – Parks and Recreation Office and Fire Barn Police Department Public Services – City Shop, Mechanic Shop, Water Treatment Plant, and Wastewater Treatment Plant

Inspections for Workplace Violence hazards may include assessing factors specific to the City of Imperial’s workplace, such as the following:

- 1) The exterior and interior of the workplace for its attractiveness to robbers;
- 2) The need for violence surveillance measures, such as mirrors and cameras;
- 3) Procedures for employee response during a robbery or other criminal act, including the City of Imperial’s directive prohibiting employees, who are not peace officers, from confronting violent persons or persons committing a criminal act;
- 4) Procedures for reporting suspicious persons or activities;
- 5) Effective location and functioning of emergency buttons and alarms;
- 6) Posting of emergency telephone numbers for law enforcement, fire, and medical services;
- 7) Whether employees have access to a telephone with an outside line;
- 8) Whether employees have effective escape routes from the workplace;
- 9) Whether employees have a designated safe area where they can go to in an emergency;
- 10) Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems;
- 11) Frequency and severity of threatening or hostile situations that may lead to



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violent acts by persons who are service recipients of the City of Imperial our establishment;

- 12) Employees' skill in safely handling threatening or hostile service recipients;
- 13) 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;
- 14) The use of work practices such as the "buddy" system for specified emergency events;
- 15) The availability of employee escape routes;
- 16) How well the City of Imperial's establishment's management and employees communicate with each other;
- 17) 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;
- 18) Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees;
- 19) Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace; and

2) Investigation of Workplace Violence Hazards

The City of Imperial will initiate an investigation following the identification of a Workplace Violence hazard in order to evaluate the nature of the hazard.

The City of Imperial may undertake the following as part of such investigation, as applicable:

- 1) Collection of statements from witnesses;
- 2) Collection of photographic or video evidence of damage or injuries, where appropriate; and
- 3) Consultation with the affected employees, witnesses, and Committee members to identify potential contributing causes.

3) Correction of Workplace Violence Hazards



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After the identification and investigation of a Workplace Violence hazard and after a Workplace Violence Hazard inspection, the City of Imperial will take appropriate steps to correct the hazard and prevent or control future or potential hazards by implementing the following measures:

- 1) **Substitution:** When possible, the City of Imperial will correct a hazard by eliminating or substituting it with a safer Work Practice Control (“Substitution”).
- 2) **Removal of Employees:** In the event that a Workplace Violence hazard exists that cannot be immediately corrected without endangering employees or property, the City of Imperial will remove all employees from the work site except those necessary to correct the existing hazard. Employees who are necessary to correct the hazard will be provided with necessary protection in order to protect them from the hazard.
- 3) **Replacement of Equipment:** If a piece of equipment is hazardous, the City of Imperial will remove it from service and identify it as defective.
- 4) **Engineering Controls:** The City of Imperial will apply physical changes to either remove the hazard from the workplace or create a barrier between employees and the hazard. Based on the nature of the hazard and the needs of the workplace, Engineering Control strategies may include the following: (a) using physical barriers (such as enclosures or guards) or door locks to reduce employee exposure to the hazard; (b) metal detectors; (c) panic buttons; (d) improved or additional lighting; and (e) more accessible exits (where appropriate).
- 5) **Work Practice Controls:** The City of Imperial will adjust Work Practice Controls if Substitution or Engineering Controls are impossible or inappropriate. Additional Work Practice Controls may be necessary in addition to Substitution and Engineering Controls to prevent future Workplace Violence hazards. Work Practice Control strategies may include the following: (a) ensuring employees have access to a telephone with an outside line; posting emergency telephone numbers in the workplace for law enforcement, fire, and medical services; (b) improved or altered communication measures; (c) improved or altered policies of prohibited practices (such as a weapons ban or limitation of the amount of cash on hand); and a “buddy system” for specified Emergency events; (d) adding security cameras or mirrors.
- 6) **Training:** The City of Imperial will educate employees about the identified hazard in subsequent WVPP training.
- 7) **Collaborate with the Committee:** The City of Imperial will collaborate with the



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Committee on other ways to correct the hazard.

- 8) **Notice to Affected Employees:** The City of Imperial will notify affected employees in writing of the corrective measures the City of Imperial implemented to address the Workplace Violence hazard.

4) **Recording Information regarding Workplace Violence Incidents**

The City of Imperial will document the identification, investigation, and correction of Workplace Violence hazards and maintain such records for at least five (5) years following the identification, investigation, and correction of such hazards.

The City of Imperial shall record information in the Violent Incident Log for each Workplace Violence incident.

Information that is recorded in the Log for each incident shall be based on information solicited from the employee(s) who experienced the Workplace Violence, on witness statements, and on investigation findings.

The Log is attached to the WVPP as Attachment A.

The City of Imperial will document all work-related injuries or illness caused by Workplace Violence that resulted in death, loss of consciousness, days away from work, restricted work activity or job transfer, or medical treatment beyond first aid to DOSH.

h. Responding to Workplace Violence Emergencies

The City of Imperial will use the STOPit platform's broadcast feature as the city's emergency alerting system to alert employees of the presence, location, and nature of Workplace Violence Emergencies. All city phones are required to have the STOPit app downloaded, so that employees can receive broadcast alerts. The city also encourages employees to download the STOPit app to their personal phones in order to receive emergency broadcast alerts.

Following a Workplace Violence Emergency, a notification through the alerting system will include information regarding the following:

- 1) The existence/presence of a Workplace Violence Emergency;
- 2) The location of a Workplace Violence Emergency;
- 3) The nature of the Workplace Violence Emergency; and



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- 4) The appropriate response procedures for employees.

The City of Imperial has developed the following evacuation and/or sheltering plan for each City of Imperial workplace:

- 1) **Evacuation Protocols:** Evacuation Protocols are determined per department and each department is required to review with its employees the appropriate evacuation protocols for their department. If an employee has a question or is unsure of their department's evacuation protocols they should ask their supervisor and the supervisor will inform them.
- 2) **Sheltering Protocols:** Sheltering Protocols are determined per department and each department is required to review with its employees the appropriate sheltering protocols for their department. If an employee has a question or is unsure of their department's sheltering protocols they should ask their supervisor and the supervisor will inform them.

In a Workplace Violence Emergency, employees should promptly call 911. If possible, employees can also obtain help from any director, manager or supervisor, the Coordinators, any Committee member, or from law enforcement employees.

i. Training

The City of Imperial shall provide training when the Plan is first established and when new employees are hired.

The City of Imperial shall ensure annual training thereafter.

The City of Imperial shall provide training on all of the following subjects:

- 1) The City of Imperial's Plan, how to obtain a copy of the City of Imperial's Plan at no cost, and how to participate in the development and implementation of the City of Imperial's Plan;
- 2) Definitions and requirements of the Plan;
- 3) How to report Workplace Violence incidents or concerns to the City of Imperial or law enforcement without fear of reprisal;
- 4) Workplace Violence hazards specific to the employees' jobs, the corrective measures the City of Imperial has implemented, how to seek assistance to prevent



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or respond to violence, and strategies to avoid physical harm; and

- 5) The City of Imperial's Violent Incident Log (Appendix A), and how to obtain copies of records related to Workplace Violence.

The training shall include an opportunity for interactive questions and answers with a person knowledgeable about the City of Imperial's Plan.

The City of Imperial shall provide additional training when a new or previously unrecognized Workplace Violence hazard has been identified and when changes are made to the Plan.

VI. Recordkeeping

The City of Imperial shall maintain the following types of records for the following periods:

Type of Record	Maintenance Period
Records of Workplace Violence hazard identification, evaluation, and correction	Minimum of five (5) years
Training records, including 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	Minimum of one (1) year
Violent Incident Logs	Minimum of five (5) years
Records of Workplace Violence incident investigations. These records must not contain medical information.	Minimum of five (5) years

The City of Imperial shall ensure that records of Workplace Violence Incident Investigations do not contain any medical information including any information in electronic or physical form, in possession of or derived from a provider of health care, health care service plan, pharmaceutical company, or contractor regarding a patient's medical history, mental health application information, reproductive or sexual health application information, mental or physical condition, or treatment that includes or contains any element of personal identifying information sufficient to allow identification of the individual.

The City of Imperial shall make all records required by this WVPP available to DOSH upon request for purposes of examination and copying.



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The City of Imperial shall make the following records available to employees and their Designated Representatives, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request:

- 1) Records of Workplace Violence hazard identification, evaluation, and correction;
- 2) Training records; and
- 3) Violent Incident Logs.



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**APPENDIX A
VIOLENT INCIDENT LOG
PAGE 1**



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APPENDIX A
VIOLENT INCIDENT LOG
PAGE 2

City of Imperial Violent Incident Log: Detailed Description of Violent Incident and Documentation of City of Imperial's Actions Taken

When recording this information, the reporting employee must omit any element of personal identifying information sufficient to allow 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.

Log Entry Number	Detailed Description of Violent of Incident	If Authorities were Contacted, Details of Law Enforcement Response	Actions Taken to Protect Employees from Continuing Threat/ Any other Hazards Identified as a Result of the Incident



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APPENDIX B
EMPLOYEE ACKNOWLEDGMENT OF
RECEIPT OF WORKPLACE VIOLENCE PREVENTION PLAN (WVPP)

My signature below acknowledges that I have received my copy of the City of Imperial's Workplace Violence Prevention Plan ("WVPP" or "Plan") and that I have read the Plan and understand my rights and obligations under the same.

By signing below, I agree to abide by all provisions of the Plan. I understand that failure to fully comply with all provisions of the Plan may lead to disciplinary action, up to and including termination.

PRINT FULL NAME: _____

SIGNATURE: _____

DATE: _____

(RETAIN IN EMPLOYEE PERSONNEL FILE)