



## WORKPLACE VIOLENCE PREVENTION PLAN

In keeping with Labor Code Section 6401.9, North Bay Schools Insurance Authority (“NBSIA”) hereby adopts this Workplace Violence Prevention Plan (“Plan”), with this Plan remaining in effect until expressly modified by a subsequent written and published document. This Plan may only be changed or modified by the Executive Director, with the Plan in effect at all times, and in all locations in which we perform services or job-related tasks.

In keeping with the standards set forth in our Personnel Handbook, which is incorporated herein by reference, no employee who reports in good faith an act of actual or potential Workplace Violence to NBSIA or law enforcement, or who participates in an investigation of such acts or threats, shall be subject to retaliation or discipline. All reports of actual or threatened Workplace Violence will be promptly investigated in keeping with all governing laws and regulations, and the policies and procedures in our Personnel Handbook, with the results of the investigation, and any corrective or remedial measures, shared with the relevant employees in keeping with such standards.

### 1. DEFINITIONS

- **Emergency** - Unanticipated circumstances that can be life threatening or pose a risk of significant injury to an employee or guest.
- **Engineering Controls** - A physical barrier or device that seeks to remove or limit a hazard from the workplace or that creates a barrier between the hazard and an employee or guest.
- **Log** - The Violent Incident Log as required by Labor Code Section 6401.9.
- **Serious Injury or Illness** – A workplace-related injury or illness requiring in-patient hospitalization (other than for medical observation or diagnostic testing), or that results in an employee or guest losing a portion of their body due to amputation or similar surgical procedure, the loss of an eye, or serious and permanent disfigurement. A serious injury does not include an injury caused by an accident on a public street or highway, unless the accident occurred in a construction zone.
- **Threat of Violence** - Any verbal or written statement, by any person, including text and 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 without a legitimate purpose, including robberies or other claims in which the victim is made to believe harm will occur in the absence of cooperation.
- **Workplace Violence** – Any actual act of violence, or Threat of Violence, which occurs in a place of employment or that directly seeks to interfere or impede the orderly course of business at a work environment or work event. Workplace Violence includes, but is not limited to:
  - The use or threat to use physical force against an employee or guest that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee or guest sustains an actual injury.
  - The use or threat to use a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee or guests sustains an actual injury.

Workplace Violence and/or a Threat of Violence does not include lawful acts of actual or threatened self-defense or defense of others.

- **Work Controls** - Procedures and rules which are used to effectively reduce Workplace Violence hazards.

## **5. COMMUNICATION WITH EMPLOYEES**

To support this Plan, including clear and understandable standards and expectations of our employees, we shall communicate the importance of this Plan and workplace safety through:

- New employee orientations that include information on our Workplace Violence prevention policies and procedures, as well as subsequent training programs, discussions, or reminders on at least an annual basis, or as the active employee engagement may determine is needed.
- Effective communication between employees and supervisors about Workplace Violence prevention and violence concerns, as well as methods that may be used to report a concern about Workplace Violence or threats of violence.
- Posted or distributed Workplace Violence prevention information.
- Training on how to report a Workplace Violence incident, threat, or other Emergency concern.

## **6. COORDINATION WITH OTHER EMPLOYERS**

If NBSIA uses the services of any other employer (staffing agency or otherwise), the contents of this Plan and its obligations shall be shared with the individual(s) provided by such other employer.

## **7. WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

All threats or acts of Workplace Violence should be immediately reported to an HR/Operations Manager and may also be shared with the employee's supervisor or manager, with such contact made preferably in person or via telephone/video conference to expedite the report and all relevant information. Email or text should be a secondary method of contact since it may not result in the most immediate and complete sharing of information.

To the extent permitted by law, a report may be anonymous, although the resulting investigation and/or ability to conduct remedial action may be impeded by anonymous reporting. There may be times, due to the nature of the report, necessary or agreed remedial measures, or the need to comply with mandatory or law enforcement reporting obligations, that anonymity or complete anonymity cannot be guaranteed. However, confidential personal identification information shall never be disclosed absent the employee's advance consent, unless we are required to do so by law or Court Order.

## **8. EMERGENCY RESPONSE PROCEDURES**

In the case of a Workplace Violence Emergency, you should seek to immediately notify the HR/Operations Manager or another member of the Management Team, who will then seek to immediately notify all potentially affected employees in person (if possible), by call, text, or paging system. Given our security access system preventing unauthorized access into our work areas, as a general rule remainder in the building may be the safest and most secure response. In case of an actual or potential breach of our security access system, staff should use the closest exit to them, after first seeking to determine (if we are unable to share this information) that it is reasonably safe to exit the building or work area. No employee should seek to place themselves in personal harm or jeopardy in response to a Workplace Violence Emergency.

In a Workplace Violence Emergency, the HR/Operations Manager and/or any Management Team member will seek to contact emergency responders and gain additional guidance on safety or exit processes or procedure that might be appropriate. This will help ensure clarity in information being shared with first responders and their response. If you believe it appropriate, however, you may separately contact emergency first responders regarding individual situations that may apply, particularly if the ability to jointly communicate with the HR/Operations Manager or other Management Team members is limited or impaired.

Emergency contact information for our Management Team Members is as follows:

- o Detailed information regarding the date, time, and location of the incident, what occurred, who was involved (respecting anonymity when possible and/or required by law), whether law enforcement or other first responders were involved, the nature and extent of identifiable injuries, whether OSHA/Cal-OSHA was notified, the results of the incident, along with any other information discovered or disclosed during the investigation of relevance in determining causation or remedial measures, as well as any identified remedial measures taken/to be taken in specific response to the Workplace Violence incident.

## 11. TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will be trained on this Plan, and any job-specific Workplace Violence prevention practices. When appropriate, supplemental or special training will be provided. Training shall occur on an annual basis, in a manner most conducive to sharing information in an understandable form and format within all staff, or following an incident of Workplace Violence, or a change in our policies, procedures, or practices.

Annual training will include information on how to report Workplace Violence incidents, opportunities for active employee engagement, and any changes or updates to this Plan.

## 12. ACCESS TO THIS PLAN/MAINTENANCE OF INFORMATION

This Plan shall be made available in writing, and otherwise easily accessible, to all employees, authorized employee representatives, and representatives of Cal/OSHA, including online versions posted to our website.

We will also maintain, and make available to employees and any regulatory agency:

- Create and maintain records of Workplace Violence hazard identification, evaluation, and corrective measures for a minimum of five (5) years, which shall be maintained with our Workplace Violence Log.
- Create and maintain training records for a minimum of one (1) year, including training dates, general summaries of training provided (including who provided the training), and the list of attendees and their job titles.
- Create and maintain a Workplace Violence Log for minimum of five (5) years, including all information set forth in this Plan and Labor Code Section 6401.9(f).

## 13. EMPLOYER REPORTING RESPONSIBILITIES

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

## 14. AUTHORIZATION

As Executive Director, I hereby adopt this document as the Workplace Violence Prevention Plan of North Bay Schools Insurance Authority.

Dated: \_\_\_\_\_

6/27/2024

By: \_\_\_\_\_

Kim Santin  
Kim Santin, Executive Director  
North Bay Schools Insurance Authority