

**SAN FRANCISCO COMMUNITY COLLEGE DISTRICT
INJURY AND ILLNESS PREVENTION PROGRAM
FOR WORKPLACE SECURITY**

1999

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SAN FRANCISCO COMMUNITY COLLEGE DISTRICT

Injury and Illness Prevention Program for Workplace Security

Prevention and Response Policy and Procedures

The Federal Occupational Safety and Health Act requires that employers provide employees with a safe and healthy workplace. This requirement includes adoption of practices, means, methods, operations, and processes necessary to protect the life, safety and health of employees. State Occupational Safety and Health (OSHA) regulations require an employer who learns that a current or former employee has threatened violence against managers, supervisors or other employees may have to take certain preventive steps under the Injury and Illness Prevention Program (IIPP). This statute is cited in Title 8 of the California Code of Regulation, General Industry Safety Orders § 3202.

APPLICABILITY

This policy applies to all San Francisco Community College District's (SFCCD) employees, and to all individuals who, while not employees of the District perform work for the District for the College's and District's benefit.

Policy Statement

The preservation of the Districts human, physical and financial resources through proper accident prevention shall be recognized as an important administrative responsibility. The District will make every reasonable effort to provide a safe and healthful working environment for all employees as required by federal, state or local law, and a safe and healthful learning environment for students and visitors.

The District Director of Operations shall be named the Safety Officer for the District and will be accountable for ensuring that appropriate procedures are developed in accordance with this policy.

In addition, it is the responsibility of *all employees* to follow standards of practice consistent with this policy for the benefit of themselves, other employees, students and visitors.

DEFINITIONS

Acts of aggression include verbal or physical actions that are intended to create fear or apprehension of bodily harm.

Acts of violence include intentional or reckless physical action that cause injury or harm to, or threatens the safety of, individual in the workplace.

Workplace includes all College and District facilities and off-campus locations where faculty, staff or student employees are engaged in College or District business.

Type I workplace violence involves a violent act of an assailant with no legitimate relationship to the workplace who enters the workplace to commit a robbery or other criminal act. This includes the following departments/facilities:

- Bookstore
- Campus Police
- Admissions and Records (AR)
- Special Events

Type II workplace violence involves a violent act or threat of violence by a recipient of a service provided by SFCCD, such as a client, patient, customer or student. This includes the following departments/facilities:

- Student Health
- Bookstore
- Nursing
- Financial Aid
- Admissions and Records (AR)
- Faculty Offices

Type III workplace violence involves a violent act or threat of violence by a current or former worker, supervisor or manager, or another person who has some employment related involvement with SFCCD, such as a worker's spouse or lover, a worker's relative or friend, or another person who has a dispute with one of our workers. This includes the following departments/facilities:

- all administrative and faculty related departments.

ROLES AND RESPONSIBILITIES

SFCCD has assigned joint responsibility for security in our workplace to the Chief Operating Officer or his/her designee and the Chief of Public Safety. They have the authority and responsibility for implementing the provisions of this program for the San Francisco Community College District.

All managers and supervisors are responsible for implementing and maintaining this section of the IIPP into their departments and/or work areas and responding to questions about workplace violence. The specific roles and responsibilities are listed below:

General

- Any person experiencing or observing imminent violence should call emergency services at ext. 3200.
- Any employee who believes a crime has been committed against him/her has the right to report that to the proper law enforcement agency.

Employee (each employee shall):

1. Report any acts or threats of violence to his/her immediate supervisor, Human Resources, District Police, or the nearest member of management. Criminal acts will be promptly and thoroughly investigated by District Police. All other incidents will be investigated by Human Resources Department.
2. Notify his/her supervisor and District Police of any restraining orders against individuals that could affect the workplace.

Supervisor (the immediate supervisor will):

1. Respond to issues related to workplace safety.
2. Contact Human Resources or District Police in the event of a potential or actual incident.
3. Promptly inform District Police or Human Resources about any acts or threats of violence even if the situation has been addressed.
4. In the event that he/she is advised of a restraining order, notify District Police.

Human Resources (the staff will):

1. Consult and advise management regarding concerns about violent and potential violent employees or others.
2. In the event of an act, threat of violence, or information concerning a possible violent situation, contact District Police.
3. In conjunction with District Police, gather and maintain District-wide information on workplace acts or threats of violence.
4. Provide District-wide training for all staff on Violence in the Workplace, in coordination with District Police.

District Police (the District Police will):

1. Take appropriate law enforcement action.
2. Cooperate with all law enforcement and judicial agencies, as appropriate.
3. Consult and advise management and Human Resources regarding concerns about violent and potentially violent employees and others.

COMPLIANCE

SFCCD has established the aforementioned policy to ensure compliance with rules on workplace security. Management is committed to ensuring that all safety and health policies and procedures involving workplace security are clearly communicated and understood by all employees.

All employees are responsible for using safe work practices, for the following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment. Our 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. Informing supervisors and managers of the provisions of the SFCCD IIPP for Workplace Security.
2. Training supervisors and managers on Workplace Security so they can inform their employees of the SFCCD policy and procedures.
3. Evaluating the performance of all employees in complying with the SFCCD workplace security measures. This evaluation is incorporated into an individual's regular evaluation process.
4. Recognizing employees who perform work practices which promote security in the workplace.
5. Provide training and/or counseling to employees when their performance is deficient in complying with work practices designed to ensure workplace security.
6. Disciplining employees for failure to comply with workplace security practices.

COMMUNICATION

At SFCCD, we recognize that to maintain a safe, healthy and secure workplace we must have open, two-way communication among all employees, including managers and supervisors, on all workplace safety, health and security issues. SFCCD has a communication system designed to encourage a continuous flow of safety, health and security information between manager and employees without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following items:

1. New employee orientation on District workplace security policies, procedures and work practices.
2. Periodic review of our IIPP for Workplace Security with all personnel. This is conducted annually, unless an incident prompts more frequent reviews.
3. Training programs designed to address specific aspects of workplace security unique to our District.
4. Regular safety committee meetings that include workplace security discussions.
5. Regularly scheduled departmental safety meetings that include workplace security discussions.
6. Posted or distributed workplace security information.
7. Procedures for employees/students to inform supervisors about workplace security hazards or threats of violence.
8. Procedures for protecting employees who report threats of retaliation by the person make the threats.
9. Security issues addressed at District Police safety meetings.

HAZARD ASSESSMENT

At SFCCD, we will be performing workplace hazard assessment for workplace security in the form of periodic inspections. Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence are performed by the department heads or designated supervisor. Periodic inspections are performed according to the following schedule:

1. Frequency: semi-annually;
2. When SFCCD initially establishes its IIPP for Workplace Security;
3. When new, previously unidentified security hazards are recognized;
4. When occupational injuries or threats of injury occur; and
5. Whenever workplace security conditions warrant an inspection.

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

Inspections for Type I workplace security hazards include assessing:

1. The exterior and interior of the workplace for its attractiveness to robbers.
2. The need for security surveillance measures, such as mirrors or cameras.
3. Posting of signs notifying the public that limited cash is kept on the premises.
4. Procedures for worker response during a robbery or other criminal act.
5. Procedures for reporting suspicious persons or activities.
6. Posting of emergency telephone numbers for police, 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 time access safes for large bills.

Inspections for Type II workplace security hazards including 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 our District.
4. Employees' skill in safely handling threatening or hostile service recipients (i.e., conflict resolution training)
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 a "buddy" system for specified emergency events.
7. The availability of employees escape routes.

Inspections for Type III workplace security hazards include assessing:

1. How well the SFCCD's anti-violence policy has been communicated to employees, supervisors or managers.
2. Our workers' 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 recently discharged employees or persons with whom one of our employees is having a dispute.
4. Frequency and severity of employee reports of threats of physical or verbal abuse by managers, supervisors or other workers.
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 discharge procedures.
7. Knowledge of marital/relationship disputes, physical abuse and/or restraining orders.

INCIDENT INVESTIGATIONS

After the hazards are identified in the foregoing steps, SFCCD will develop as appropriate, engineering controls (i.e., alarms, security devices) or administrative controls (i.e., specific work practices), that will reduce or eliminate the possibility for a violent incident to occur or rapidly bring the situation under control. This response includes treatment (i.e., medical and psychological assistance) for the employees, as well as an investigation and disciplinary action, if necessary.

SFCCD has established the following procedures for investigating incidents of workplace violence and includes:

1. Reviewing previous incidents.
2. Visiting the scene of an incident as soon as possible.
3. Interviewing threatened or injured employees and witnesses.
4. Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behaviors by the perpetrator.
5. Determining the cause of the incident.
6. Taking corrective action to prevent the incident from recurring.
7. Recording the findings and corrective actions taken.

Procedures for Reporting and Investigating Threats

1. The supervisor will immediately investigate any reported threat of violence to an employee in consultation with the District Director of Human Resources and District Police. The supervisor will advise alleged victim of the right to file a police report which could result in a criminal complaint being issued.

2. The supervisor should assure employee that a thorough and prompt investigation will occur, and should ask whether employee has any suggestions for minimizing the risk of a violent act.
3. The supervisor conducting an investigation should interview the reporting party and obtain information regarding the threat which would include:
Threats or violent conduct by alleged perpetrator before this incident
 - Who made the threat;
 - Against whom was the threat made
 - Specific language of threat;
 - Any physical conduct by threatening party which would tend to substantiate that the individual intends to follow through on threat;
 - Names of any other witnesses to threat or violent conduct;
 - Time and place where threat or violent conduct occurred; and
 - Threats or violent conduct by alleged perpetrator before this incident.

EMERGENCY RESPONSE PROCEDURES

Threats of Violence

1. The employee should immediately report the incident to his/her supervisor, Human Resources, or District Police.
2. The supervisor will call Human Resources or District Police advising of the incident immediately.
3. Human Resources and the District Police will conduct a preliminary investigation to ascertain if the incident was of a criminal nature.
4. Based on the preliminary finding, appropriate action will be taken. This can include a criminal investigation conducted by the District Police and/or a disciplinary investigation conducted by Human Resources.
5. Based on the findings of the investigation/s, appropriate action will be taken.

Acts of Violence Not Involving Injuries or Weapons

1. The employee should immediately report the incident to District Police. The employee should also report the incident to his/her supervisor and/or Human Resources.
2. District Police will conduct a preliminary investigation to ascertain if the alleged act was of a criminal nature. If the act was of a criminal nature, a complete investigation will be conducted and based on the findings, appropriate action will be taken.

3. If the preliminary investigation finds the act was not criminal in nature, the investigation will be turned over to Human Resources. Human Resources will conduct an investigation of the incident and, in conjunction with management, take appropriate action.

Acts of Violence Involving Injuries or Weapons

1. Anyone witnessing or subject to an incident involving injuries or weapons should immediately call for police response (Ext. 3200). After summoning the police, the supervisor, management representative and/or Human Resources should be called.
2. Supervisor and/or management representative should attempt to ensure the safety of other employees. This can be done by having employees exit the area in which the incident is occurring. If the incident involves a gun, secure the immediate area by locking office/classroom doors, and order employees/students to lie flat on the floor; first aid should be provided, if required.
3. Supervisors, management, or employees should not intervene unless, in their best judgment, the situation is too critical to wait for law enforcement personnel or they believe intervention would be successful.
4. Once District Police is notified, they are responsible for coordinating with other law enforcement agencies and controlling the situation.
5. After the incident, District Police will be responsible for conducting the investigation and taking appropriate criminal action. Human Resources may conduct an independent investigation into the incident and, in conjunction with management take appropriate disciplinary action.

Administrative Considerations (After the incident):

1. Notice and remember participants and witnesses;
2. Direct participants and witnesses to administrative office;
3. Secure written statements that are signed and dated from those individuals
 - Statements should contain detailed facts, not conclusionary statements.

- Statements should describe participants' actions, so witnesses should be asked to describe the event act-by-act.
- 4. Advise victims of the right to file a police report which could result in a criminal complaint being issued.
- 5. Notify spouses or families of victims and participants, Chancellor, and others with a need to know (i.e., Director of Human Resources, College Chief Operating Officer, Programs Consultant Environmental Health/Safety).
- 6. After the incident, provide for mental health counseling referral for participants.
- 7. Consider appropriate disciplinary action.
- 8. Prepare reports or take administrative action, as necessary.

TRAINING

S.F.C.C.D. has established the following policy on training all workers with respect to workplace security. Where appropriate, supervisory personnel (Administrative and Faculty) and employees shall receive training on workplace security practices. Training shall be provided when the IIPP for Workplace Security is first established and periodically thereafter where appropriate. Supervisory personnel will receive training as well as guidelines and standard operating procedures (SOPs) to train their departmental employees. Conflict resolution training will be available on a periodic basis for all supervisory personnel. Additional training will be provided to all personnel whenever the employer is aware of new or previously unrecognized security hazards.

Workplace security training includes, but is not limited to, the following:

1. Explanation of the IIPP for Workplace Security including measures for reporting and violent acts or threats of violence.
2. Recognition of workplace security hazards including the risk factors associated with the three types of workplace violence.
3. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
4. Ways to defuse hostile or threatening situations.
5. Measures to summon others for assistance.
6. Routes of escape.

7. Notification of District Police when a criminal act may have occurred.
8. Emergency medical care provided in the event of any violent act upon an employee.
9. Post-event trauma counseling for those employees desiring such assistance.

SFCCD will provide conflict resolution training to the faculty and staff. Other approaches may include:

1. Publish and disseminate materials on conflict resolution to the college community.
2. Create an emergency/crisis response team utilizing experts in the counseling, social science and health areas of the campus who are trained in conflict resolution.

RECORDKEEPING

SFCCD has more than twenty employees and is on a designated high hazard industry list. We have taken the following steps to implement and maintain our Workplace Violence section of the IIPP.

1. Records of workplace security inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form; and
2. Documentation of workplace security training for each employee, including the employee's name or other identifier, training dates, type(s) of training, and training providers.

Inspection records and training documentation are maintained for one year.