



INJURY & ILLNESS PREVENTION PROGRAM

FOR

WASHINGTON UNIFIED SCHOOL DISTRICT

INJURY & ILLNESS PREVENTION PROGRAM

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INTRODUCTION

Washington Unified School District has developed this Injury & Illness Prevention Program (IIPP) in order to maintain a safe and healthy work environment. The IIPP describes the goals, statutory authority, and the responsibilities of all employees under the Program. It addresses Compliance, Hazard Identification, Accident Investigation, Hazard Mitigation, Training, Hazard Communication, and Program Documentation. By making employee safety a high priority, the District hopes to reduce injuries and illnesses, increase productivity, and promote a safe and healthy environment for all individuals.

GOALS

The Injury and Illness Prevention Program is designed to prevent injuries, illnesses, and accidents in the workplace. The purpose of the program is to protect the safety and health of all employees.

STATUTORY AUTHORITY

This Injury and Illness Prevention Program, and compliance with it, is mandated under the following laws:

- California Labor Code Section 6401.7.
- California Code of Regulations Title 8, Sections 1509 and 3203.

The Board of Education has outlined the requirements of the Washington Unified Illness and Injury Prevention Program in Board Policy 4157.

INJURY AND ILLNESS PREVENTION PROGRAM COMPONENTS

The Injury and Illness Prevention Program includes the following components:

- Safety and health inspections to find & eliminate unsafe working conditions and practices, to control health hazards, & to comply fully with the safety and health standards for every job.
- Training to all employees in good safety and health practices.
- Mechanical and physical safeguards to the maximum extent possible.
- Provides employees with personal protective equipment and instructions for its use and care.

- Enforces safety and health rules through a program of incentives and disciplinary procedures.
- A procedure for the investigation of every injury, which includes determining the cause of the incident and the corrective actions taken to prevent its recurrence.
- A method for communicating with employees on occupational health and safety matters.

RESPONSIBILITY

The responsibility for establishing and maintaining effective environmental health and safety policies, specific to District facilities and operations, rests with the Superintendent of Washington Unified School District.

Board of Education

The Board of Education is ultimately responsible for the safety and loss control efforts of the District. Therefore, the Board of Education will provide overall policy direction for the District's Safety Program and hold personnel accountable for the program.

Superintendent

General policies, which govern the activities and responsibilities of the Injury & Illness Prevention Program, are established under the Superintendent's final authority. The Superintendent is responsible for developing and managing this Injury & Illness Prevention Program. The Superintendent may assign all or some of the program tasks to other District personnel. However, the Superintendent remains ultimately responsible for the implementation and maintenance of the District's Injury and Illness Prevention Program.

Administrators, Managers, Supervisors, and Principals

Administrators, Managers, Supervisors, and Principals are fully responsible and accountable to the Superintendent for compliance with the provision of the programs within their area of responsibility. Their responsibilities include, but are not limited to:

- Providing job-specific and general safety and hazard training to employees, including safety orientation.
- Documenting all safety trainings.
- Providing safe and healthy working conditions for all employees.
- Purchasing appropriate protective equipment, distributing it to employees, training employees on its proper use, and ensuring employee compliance & usage of the equipment.

- Conducting periodic site inspections and taking immediate action in rectifying dangerous work conditions, work procedures, and/or attitudes that adversely affect the health and safety of all employees.
- Investigating industrial accidents, injuries, illnesses and near miss incidents and determining the cause of the incident & the corrective actions needed to prevent its recurrence.
- Communicating with employees on occupational health and safety issues.
- Ensuring safety responsibilities are clearly outlined in the job descriptions, which govern the employees under their direction.
- Evaluating and ensuring employee compliance.

All Employees

Safety is every employee's responsibility. All employees of the District are responsible for working safely and maintaining a safe work environment. As a condition of employment, employees must exercise due care in the course of their work to prevent injuries to themselves and to their fellow workers and actively contribute to the success of the overall safety program. At minimum, employees must:

- Comply with all District and departmental safety policies and procedures.
- Notify their supervisor if they do not fully understand District and/or departmental safety policies and procedures and/or the hazards associated with their job.
- Report all dangerous work conditions and/or defective tools, equipment and safety devices to their supervisor immediately.
- Report all accidents, near misses and injuries to their supervisor immediately.
- Keep working areas clean and orderly at all times.
- Avoid disorderly conduct such as horseplay, fighting and practical jokes.
- Wear required protective safety equipment and clothing as required by departmental safety rules and procedures or as directed by their supervisor.
- Attending/participating in District provided training and information programs.

Risk Manager

The Risk Manager is responsible for

- Coordinating the implementation of the Injury and Illness Prevention Program with support from the Superintendent, Managers, Supervisors, and Principals.
- Consulting with District employees on loss prevention matters and providing guidance to assure effective administration of the Injury and Illness Prevention Program.
- Maintaining a loss prevention program.
- Maintaining and reviewing all safety hazard investigation reports and publicizing information to inform management and personnel of circumstances which call for strong corrective measures.

TRAINING

Effective communication of safety information lies at the very heart of a successful Injury & Illness Prevention Program. All employees must be trained in general safe work practices. In addition, specific instruction regarding hazards unique to each employee's job assignment will be provided.

General Safe Work Practices

At a minimum, all employees will be trained in the following:

- Fire Safety, Evacuation, and Emergency Procedures
- Hazard Communication (Use of Material Safety Data Sheets)
- Bloodborne Pathogens
- Heat Illness Prevention Program
- Injury & Illness Prevention Program

Specific Safe Work Practices

In addition to general training, each employee will be instructed how to protect themselves from the hazards specific to their individual job duties. At a minimum, this includes how to use workplace equipment, safe handling of hazardous materials, and use of personal protective equipment. Training must be completed before beginning to work on assigned equipment, and whenever new hazards or changes in procedures are implemented. The Superintendent is responsible for providing Site Administrators, Supervisors, and Managers with the training necessary to familiarize themselves with the safety and health hazards their employees are exposed to.

It is the responsibility of each Site Administrator, Supervisor, and Manager to know the hazards related to his/her employees' job tasks, and insure they receive appropriate training.

1. Supervisors will ensure that all employees receive general and job-specific training prior to initial or new job assignments.
2. Supervisors will ensure that employees are trained whenever new substances, processes, procedures or equipment are introduced to the workplace, which may create new hazards. Training must also be given when new or previously unrecognized hazards are brought to a supervisor's attention.
3. Supervisors will provide training or retraining as necessary or as requested by an employee and/or required by law.
4. Trainings will be provided to familiarize supervisors with the safety and health hazards to which employees under their immediate direction and control may be exposed.
5. All training will be documented and kept on site and with the Risk/Benefits Manager.

HAZARD IDENTIFICATION

A health and safety inspection program is an essential tool for locating and reporting unsafe conditions and activities, which have the potential to cause injuries, accidents, and/or property damage. It is the responsibility of Washington Unified School District to ensure that appropriate, systematic safety inspections are conducted.

Scheduled Safety Inspections

Continuous or daily site inspections should be conducted by supervisors and employees as part of their ordinary work or job responsibilities. This type of inspection activity and safety consciousness is a major contributor to workplace safety. All dangerous work conditions and/or defective tools, equipment and safety devices should be reported to the supervisor immediately.

The Maintenance, Operations and Transportation Department will conduct documented site safety inspections. Completed inspection forms will be submitted to the Director of MOT and the Risk/Benefits Manager each month for review.

The timeline for conducting documented safety inspections is as follows:

- Annual inspections of all office areas will be conducted to detect and eliminate any hazardous conditions that may exist.

- Semi-annual inspections of all potentially hazardous areas (shops, cafeterias, warehouses, gymnasiums, sheds, etc.) will be conducted to detect and eliminate any hazardous conditions that may exist.
- Semi-annual inspections of industrial arts, science, and home economics classrooms and equipment; playground equipment; athletic equipment; facilities housing and athletic equipment will be conducted to detect and eliminate any hazardous conditions that may exist.
- Daily inspections of buses will be conducted to detect and eliminate any hazardous conditions that may exist.

Unscheduled Safety Inspections

- Additional safety inspections will be conducted whenever new equipment or changes in procedures are introduced into the workplace.
- Safety inspections will also occur when the District is made aware of a new or previously unrecognized hazard.
- Safety reviews will be conducted when occupational accidents occur to identify and correct hazards that may have contributed to the accident.

ACCIDENT INVESTIGATIONS

All accidents, injuries, illnesses, and near-miss incidents and exposures to hazardous substances during employment with the District will be investigated by the employee's supervisor using the Supervisor's Report of Industrial Injury/Illness. Appropriate repairs or procedural changes will be implemented promptly to correct the hazards implicated in these events. Particular attention will be given to ways to prevent future occurrences of the event. The Accident Investigation Guide has helpful tips for investigating accidents.

To ensure timely accounting for workers' compensation procedures, both employee and their supervisor must complete their respective documentation, which is available at the District Office or school site.

HAZARD CORRECTION

All hazards identified will be promptly investigated and alternate procedures implemented as indicated. The District recognizes that hazards range from imminent dangers to hazards of relatively low risk. Corrective actions or plans, including suitable timetables for completion, are the responsibility of the Site Administrator or Superintendent.

Supervisors should inform all employees of any unsafe conditions that cannot be immediately corrected and ensure that all necessary precautions are taken to prevent

mishaps. Facilities and equipment found to be unsafe for use should be marked or sectioned off by the supervisor until the hazard can be corrected. Personnel who continue to use any item that has been marked unsafe, who remain in sectioned off hazardous areas, or who willfully remove any hazard barriers before the unsafe condition is corrected is subject to disciplinary action up to and including dismissal.

COMMUNICATION

Effective two-way communication, which involves employee input on matters of workplace safety, is essential to maintaining an effective Injury & Illness Prevention Program. To foster better safety communication, the following guidelines will be implemented:

Each site will use an Employee Bulletin Board, in a location accessible to all employees, for posting information on safety. Changes in protocol, safety bulletins, accident statistics, training announcements, and other safety information will be posted, as available.

Site Administrators, Managers, and Supervisors will provide time at periodic staff meetings to discuss safety topics. Status reports will be given on safety inspections, hazard correction projects, and accident investigation results, as well as feedback to previous employee suggestions. Employees will be encouraged to participate and give suggestions without fear of reprisal. Additional communication methods to be used include:

- Posters
- Training Programs
- Written Communications

Employees are required to immediately report any unsafe condition or hazard that they discover in the workplace to their supervisor, the maintenance department, or other authority. The work order system can be used to report unsafe conditions or hazards to maintenance. Each school site has personnel that can enter work orders into the system.

Employees who wish to remain anonymous may report unsafe conditions or hazards by submitting the work order form without identifying themselves. No employee will be disciplined or discharged for reporting any workplace hazard or unsafe condition. Supervisors will follow up all suggestions and investigate the concerns brought up through these communication methods. Feedback to the employees is critical, and must be provided for effective two-way communication.

DOCUMENTATION

Many standards and regulations of Cal/OSHA (California/Occupational Safety and Health Administration) contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections and other activities relevant to occupational health and safety. To comply with these regulations, as well as to demonstrate that the critical elements of this Injury & Illness Prevention Program are being implemented, the following records will be kept on file in the District Office and/or school site for at least the length of time indicated below:

- Copies of all IIPP Safety Inspection Forms. Retain 5 years.
- Copies of all Accident Investigation Forms. Retain 5 years.
- Copies of all Employee Training Checklists/Documents. Retain for the duration of employee's employment.
- Copies of all Safety Meeting Agendas. Retain 5 years.

The District will ensure that these records are kept in the employee's personnel file or online, and present them to Cal/OSHA or other regulatory agency representatives if requested. A review of these records will be conducted by the Risk/Benefits Manager to measure compliance with the Program.

COMPLIANCE

Compliance with this Injury & Illness Prevention Program will be achieved in the following manner:

Disciplinary System

Site Administrators, Supervisors, and Managers will use all disciplinary procedures available to them to ensure that employees follow established safety policies and procedures. Failure to comply with the safety guidelines of the Injury and Illness Prevention Program will result in disciplinary actions covered under:

- Washington Teachers' Association Contract Article 21: Discipline
- California School Employees Association Contract Article 13: Disciplinary Action

Incentive Program

Incentives will be offered to school sites and to those employees who comply with the safety policies and procedures of the Injury and Illness Prevention Program.

**INJURY & ILLNESS PREVENTION
PROGRAM
SUPPLEMENT FOR
WORKPLACE VIOLENCE AND CAMPUS
SECURITY**

WORKPLACE VIOLENCE IN CALIFORNIA

The circumstances associated with workplace violence in California can be divided into three major types. However, it is important to keep in mind that particular occupations or workplaces may be subject to more than one type, but some or all may not apply to violence in school districts.

A HISTORY

Type I - In California, the majority of fatal workplace assaults involve a person entering a small late-night retail establishments, e.g., liquor store, gas station or a convenience food store, to commit a robbery. During the commission of the robbery, an employee, or more likely, the proprietor, is killed or injured. These types of exposure rarely occur at school sites, but they can happen. Private enterprise usually attracts this type of violence

Employees or proprietors who have face-to-face contact and exchange money with the public, who work late at night and into the early morning hours, and who often work alone or in very small numbers are at greatest risk of a Type I event. While a potential assailant may feign being a parent as a pretext to enter a District site, he or she has no legitimate relationship to the site. It is extremely important that District site visitors be challenged if they are not wearing appropriate ID.

Robberies resulting in workplace assaults usually occur between late night and early morning hours and are most often armed robberies. Many potential victims of late night school site violence could be teachers or administrators who are attacked while working late at their site or janitors who are assaulted while cleaning the site after it is closed.

Type II - A Type II workplace violence event involves an assault or threat by someone who is either the recipient or the object of a service provided by the affected workplace or the victim. Type II events involve fatal or nonfatal injuries to individuals who provide services to the Public. Typically these events chiefly involve assaults on public safety and correctional personnel, municipal bus or railway drivers, health care and social service providers, teachers, school district security personnel, sales personnel, and other public or private service sector employees who provide professional, public safety, administrative or business services to the public. Law enforcement personnel are at risk of assault from the "object" of public safety services (suspicious persons, detainees, or arrestees) when making arrests, and enforcing the laws of the jurisdiction which they serve

Of increasing concern, though, are Type II events involving assaults to the following types of service providers:

- (1) Medical care providers in acute care hospitals, long-term care facilities, outpatient clinics and home health agencies;
- (2) Mental health and psychiatric care providers in inpatient facilities, outpatient clinics, residential sites and home health agencies;
- (3) Alcohol and drug treatment providers;
- (4) Social welfare providers in unemployment offices, welfare eligibility offices, homeless shelters, probation offices and child welfare agencies;
- (5) Teaching, administrative and support staff in schools where students have a history of violent behavior; and
- (6) Other types of service providers, e.g., justice system personnel, customer service representatives and delivery personnel.

Unlike Type I events which often represent irregular occurrences in the life of any particular District, Type II events occur on a daily basis in many Districts, and therefore represent a more pervasive risk.

Type III - A Type III workplace violence event consists of an assault by an individual who has some employment-related involvement with the workplace. A Type III event usually involves a threat of violence, or a physical act of violence resulting in a fatal or nonfatal injury, by a current or former employee, supervisor or manager; a current or former spouse or lover; a relative or friend; or some other person who has a dispute involving an employee of the workplace. Available data indicates that a Type III event is not associated with a specific type of workplace or occupation. Any workplace can be at risk of a Type III event. However, Type III events account for a much smaller proportion of fatal workplace injuries than Types I and II. Nevertheless, Type III fatalities often attract significant media attention and are perceived as being much more common than they actually are.

INJURY AND ILLNESS PREVENTION PROGRAM **SUPPLEMENT FOR WORKPLACE SECURITY**

The IIP Program Supplement for Workplace Security addresses the hazards known to be associated with the three major types of workplace violence.

Type I workplace violence involves a violent act by an assailant with no legitimate relationship to the workplace who enters the workplace to commit a robbery or other criminal act.

Type II involves a violent act or threat of violence by a recipient of a service provided by our District, such as a student, parent, safety officer, teacher, employee or administrator.

Type III involves a violent act or threat of violence by a current or former employee, supervisor or manager, or another person who has some employment-related involvement with our District, such as an employee's spouse or lover, an employee's relative or friend, or another person who has a dispute with one of our employees.

RESPONSIBILITY

We have decided to assign responsibility for security in our workplace. The IIP Program Supplement administrator for workplace security is the Superintendent and has the authority and responsibility for implementing the provisions of this program.

All managers and supervisors are responsible for implementing and maintaining this IIP Program Supplement in their work areas and for answering employee questions about the IIP Program. A copy of this IIP Program Supplement is available from each site administrator.

COMPLIANCE

We have established the following policy to ensure compliance with our rules on workplace security. The District is committed to ensuring that all safety and health policies and procedures involving workplace security are clearly communicated and understood by all District employees. All employees are responsible for using safe work practices, for 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 employees, supervisors and managers of the provisions of our IIP Program Supplement for Workplace Security.
- 2) Evaluating the performance of all employees in complying with our District's workplace security measures.
- 3) Providing training and/or counseling to District employees whose performance is deficient in complying with work practices designed to ensure workplace security.
- 4) Disciplining employees for failure to comply with workplace security practices.

COMMUNICATION

At Washington Unified School District, it is recognized that to maintain a safe, healthy and secure workplace there must be open, two-way communication between all employees, including managers and supervisors, on all workplace safety, health and security issues. Our District has a communication system designed to encourage a continuous flow of safety, health and security information between management and our employees, without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following checked items:

- New employee orientation on our District's workplace security policies, procedures and work practices.
- Periodic review of our IIP Program for Workplace Security with all personnel.
- Training programs designed to address specific aspects of workplace security unique to our District.
- Regularly scheduled safety meetings with all personnel that include workplace security discussions.
- A system for employees to inform management about workplace security hazards or threats of violence.
- Procedures for protecting employees who report threats from retaliation by the person making the threats.
- Our District communicates with and instructs employees orally about general safe work practices with respect to workplace security.

HAZARD ASSESSMENT

The District will be performing workplace hazard assessment for workplace security in the form of periodic inspections. Periodic inspections for security hazards consist of 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. Inspections for each type of workplace violence will be assessed by using the methods specified below.

Inspections for Type I workplace security hazards include assessing:

- 1) The need for security surveillance measures, such as cameras.
- 2) Procedures for employee response during a criminal act.
- 3) Procedures for reporting suspicious persons or activities.
- 4) Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.

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 our District.
- 4) Employees' skill in safely handling threatening or hostile service recipients.
- 5) Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., radios, phone intercom system.

Inspections for Type III workplace security hazards include assessing:

- 1) How well our District's anti-violence policy has been communicated to employees, supervisors or managers.
- 2) How well our District's management and employees communicate with each other.
- 3) Our employees', supervisors' and managers' knowledge of the warning signs of potential workplace violence.
- 4) Access to and freedom of movement within, the workplace by non-employees, including recently discharged employees or persons with whom one of our employee's is having a dispute.
- 5) Frequency and severity of employee reports of threats of physical or verbal abuse by managers, supervisors or other employees.
- 6) Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
- 7) Employee disciplinary and discharge procedures.

INCIDENT INVESTIGATIONS

We have established the following policy for investigating incidents of workplace violence. Our procedures for investigating incidents of workplace violence, which includes threats and physical injury, include:

- 1) Reviewing all 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 behavior 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.

HAZARD CORRECTION

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

Corrective measures for Type I workplace security hazards can include:

- 1) Utilizing surveillance measures, such as cameras, to provide information as to what is going on outside and inside the workplace.
- 2) Procedures for the reporting suspicious persons or activities.
- 3) Employee, supervisor and management training on emergency action procedures.

Corrective measures for Type II workplace security hazards can 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 our District.
- 4) Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.

Corrective measures for Type III workplace security hazards can include:

- 1) Effectively communicating our District's anti-violence policy to all employees, supervisors or managers.
- 2) Improving how well our District'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 our employee's is having a dispute.
- 5) Providing counseling to employees, supervisors or managers who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of co-employees.
- 6) Ensure that 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) Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.

TRAINING AND INSTRUCTION

We have established the following policy on training all employees with respect to workplace security. All employees, including managers and supervisors, shall have training and instruction on general workplace security practices. Training and instruction shall be provided when the IIP Program for Workplace Security is first established and periodically thereafter. Training shall 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 security training for that job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards. General workplace security training and instruction includes, but is not limited to, the following:

- 1) Explanation of the IIP Program for Workplace Security including measures for reporting any 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) Employee routes of escape.
- 7) Notification of law enforcement authorities 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.

In addition, we provide specific instructions to all employees regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

We have chosen the following checked items for Type I training and instruction for managers, supervisors and employees:

- ✓ Location and operation of alarm systems.
- ✓ Communication procedures.

We have chosen the following checked items for Type II training and instruction for managers, supervisors and employees:

- ✓ Dealing with angry, hostile or threatening individuals.
- ✓ Location, operation, care, and maintenance of alarm systems and other protective devices.
- ✓ Communication procedures.
- ✓ Awareness of indicators that lead to violent acts by service recipients.

We have chosen the following checked items for Type III training and instruction for managers, supervisors and employees:

- ✓ Pre-employment screening practices.
- ✓ Awareness of situational indicators that lead to violent acts.
- ✓ Managing with respect and consideration for employee well-being.
- ✓ Review of anti-violence policy and procedures.

RECORDKEEPING

We are a local governmental entity and we are not required to keep written records of the steps taken to implement and maintain this supplement our IIP Program. We do keep records of work related injuries and the subsequent investigations to determine the root cause of those injuries and to train staff to assure no one else is injured in the same manner. The records will be retained for two years from the date the District learns an injury has occurred.