



California State University Northridge

Workplace Violence Prevention Plan

<u>Plan Title: CSUN – Workplace Violence Prevention Plan</u>	
<u>Accountable Department: EHS</u>	<u>Effective Date: July 1, 2024</u>
<u>Annual Review Date: Annually Every July 1</u>	<u>Page: 1 of 20</u>

I. Purpose:

- A. California State University, Northridge (CSUN) is committed to cultivating a non-violent learning, working, and social environment, devoid of any forms of discrimination and conduct that could be considered harassing, coercive, or disruptive. The principles of mutual respect underpin our pursuit of excellence in teaching and learning. These principles not only contribute to a safe and productive workplace, but also foster a healthy campus climate for all.
- B. CSUN excels in fulfilling its missions of teaching, research, and public service when faculty, students, and staff coexist in an environment that encourages the free exchange of ideas and employs constructive conflict resolution methods. Our Workplace Violence Prevention Plan (WVPP) addresses and implements corrective measures for workplace violence hazards specific to the University’s work areas and operations.
- C. We strongly urge all members of the University community to promptly report any incidents of workplace violence incidents. Each report will be treated with the utmost seriousness and thoroughly investigated.

II. Workplace Violence Prevention Requirements:

- A. California Senate Bill 553 (SB 553) amended California Labor Code section 6401.7 and created section 6401.9 and the new requirements (Workplace Violence Prevention) found in those Labor Code sections will be in effect and enforceable on July 1, 2024.

III. Scope:

- A. The WVPP applies to all members of the University community when engaged in University academic, business, or co-curricular programs and activities, whether on or off campus. This would include the following: faculty, staff, students, volunteers, contractors, vendors, guests, and visitors. University Auxiliary organizations are responsible for applying similar practices to their respective employees, programs, and activities.

IV. Definitions:

- A. Emergency:** Unanticipated circumstances that can be life-threatening or pose a risk of significant injuries/harm to an individual. An emergency refers to unforeseen circumstances that require immediate action or an urgent need for assistance or relief.
- B. Engineering Controls:** These refer to the physical modifications made to the workplace or the implementation of certain tools and technologies to mitigate the risk of violence. These controls aim to either eliminate the hazard from the workplace or create a barrier between the worker and the hazard.
- C. Log:** The violent incident log required by Labor Code Section 6401.9.
- D. Members of the University Community.** University faculty, staff, students and volunteers.
- E. Threat of Violence.** 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.
- F. Procedural Controls:** These refer to the policies, procedures, and protocols established to prevent or manage violent incidents in the workplace. These controls are typically part of a comprehensive violence prevention program and include:
- 1. Reporting and Documentation System:** A system for reporting and documenting acts of violence. This includes procedures for workers to follow when lodging a violent incident with the employer, including how and when to report.
 - 2. Response Procedures:** Procedures for responding to instances of violence. This can include steps for immediate response, investigation, and follow-up.
 - 3. Training and Education:** Procedures for ensuring employee education and training on violence prevention. This includes training in recognizing potential risks, understanding violence prevention policy, and knowing what to do in the event of a violent incident.
 - 4. Risk Assessment and Control Measures:** Procedures for identifying contributing factors to workplace violence, assessing those factors, and selecting controls and prevention measures.

G. Workplace Violence: This refers to any act or threat of violence that occurs in a place of employment, including animal attacks. This term encompasses, but is not limited to, the following:

1. The threat or use of physical force against an individual that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, irrespective of whether an injury is sustained.
2. An incident involving the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether an injury is sustained.
3. Any act or behavior that contributes to a hostile work environment, including verbal or physical harassment, bullying, or other forms of psychological harm, which may lead to severe stress, anxiety, depression, or suicidal thoughts, irrespective of whether an injury is sustained.
4. The following four types of workplace violence:
 - i. **Type 1 Violence:** Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace with the intent to commit a crime.
 - ii. **Type 2 Violence:** Workplace violence directed at employees by students or visitors. Type 2 events primarily involve threats, intimidation, or assaults on law enforcement and public safety personnel, healthcare and student service providers, faculty, and other University employees who provide professional, public safety, administrative, or business services to the public.
 - iii. **Type 3 Violence:** Workplace violence against an employee by a present or former employee, supervisor, or manager. This usually involves an assault by a current or former employee, supervisor, or manager.
 - iv. **Type 4 Violence:** 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 individual who works or is enrolled at the University.
5. The University defines these behaviors as follows:

- i. **Intimidation:** An act towards another person, the purpose of which is to coerce, and the result of which could reasonably cause the other person to fear for their safety or the safety of others.
 - ii. **Threat of Violence:** A communicated intent to inflict physical or other harm on any person or property.
 - iii. **Act of Violence:** Exercise of physical force against another person or property.
 - iv. **Bullying:** Offensive or malicious behavior through persistent actions typically meant to undermine, intimidate, or demean the recipient.
6. The term “workplace violence” does not include lawful acts of self-defense or defense of others.
7. In the event of a conflict between a definition in the WVPP and a definition in Labor Code 6401.9, the definition in Labor Code 6401.9 prevails.

V. Workplace Violence Incidents:

A. Reporting Acts or Threats of Violence:

- 1. Members of the University community who witness or perceive an act of violence or a threat of violence on campus are encouraged to report such incidents of workplace violence through one or more of the following channels:
 - i. Dial 9-1-1 (when safe to do so)
 - ii. Use Emergency Blue Phones, which are located throughout campus and can be identified by blue lights mounted on top of the pole
 - iii. Report to their appropriate administrator, resident advisor, or faculty instructor
 - iv. Contacting the local Cal/OSHA at 1(800) 963-9424 or emailing them at InfoCons@dir.ca.gov and/or DOSHEnforcement@dir.ca.gov.
- 2. Members of the University community who witness or perceive an act of violence or a threat of violence on campus can also report such incidents of workplace violence to the CSUN Department of Police Services at (818) 677-2111. The CSUN DPS We -Tip Hotline can be reached at (818) 677-TIPS (8477).

3. The University strictly prohibits any retaliation for reporting an instance of workplace violence. Any member of the University community who retaliates against someone for reporting an incident is subject to discipline, up to and including non-retention, expulsion, and/or removal from campus.
4. To prepare for a workplace violence emergency and enhance the likelihood that a member of the University community will report an incident, the University will undertake the following actions:
 - i. Ensure that workplace violence prevention policies and procedures are discussed with all campus community, including staff, faculty, students, and other community members.
 - ii. Require employees to complete workplace violence prevention training. Encourage all other members of the University community to complete this training.
 - iii. Require all departments and administrative units to discuss, review, and communicate with their employees about security protocols and workplace violence hazards and mitigation measures in their work areas.
 - iv. Post and distribute workplace violence prevention information.
 - v. Communicate at the beginning of the semester to all members of the University community about how individuals can report a violent incident, threat, or other workplace violence concern without fear of reprisal or adverse action.

B. Incident Communication:

1. In the event of a workplace violence incident, the University will send relevant email notifications to the campus community and provide instructions when applicable.

C. Emergency Communication:

1. In the event of a workplace violence emergency, the University will communicate through the following means in a manner that is readily understandable by all members of the University community:
 - i. Alerts will be sent to members of the University community who have signed up for the University's emergency notification system through the CSUNAlert system. CSUN Alert uses Short Message System (SMS)

technology to send messages to registered phones, other wireless devices, and email addresses. Students, Faculty and Staff can register for CSUN Alert through the CSUN Portal by going to the Personal Info tab and adding their cell phone number.

- ii. Alerts will be broadcast through the emergency broadcast systems. CSUN has an Emergency Broadcast System (EBS) that uses local radio, television, press organizations, and other groups to notify the public of incidents and enlist their aid. The EBS is tested on the first Thursday of every month. The EBS is available at KABC 790 AM and KNX1070 AM.

2. When information is available and appropriate, these alerts will:

- i. Provide information about the presence, location, and nature of the workplace violence emergency.
- ii. Note evacuation or sheltering plans appropriate for the situation.
- iii. Inform recipients about how to obtain assistance from the Department of Police Services or other law enforcement agencies.

D. Restraining Order Process:

1. The University recognizes the importance of safety in the workplace and supports the use of restraining orders as a means to protect employees from threats or acts of violence. The process for obtaining a restraining order is as follows:

- i. Identification of Threat: If an employee or their collective bargaining representative identifies a threat of violence that may warrant a restraining order, they should report it to the Department of Police Services or their appropriate administrator.
- ii. Evaluation of Threat: The Department of Police Services or the appropriate administrator will evaluate the threat in consultation with the University's legal counsel to determine if a restraining order is appropriate.
- iii. Application for Restraining Order: If a restraining order is deemed necessary, the University or the collective bargaining representative, with the consent of the employee, will apply for a temporary restraining order and an order after a hearing on behalf of the employee and other employees at the workplace.

- iv. Communication: The University will communicate the status of the restraining order application to the affected employee and other relevant parties while maintaining confidentiality as required by law.
 - v. Implementation: If a restraining order is granted, the University will work with the Department of Police Services and local law enforcement to ensure the order is properly implemented and enforced.
 - vi. Review: The University will regularly review the status of the restraining order and adjust its response as necessary to ensure the continued safety of its employees.
2. An employee’s request to not be named in the temporary restraining order, shall not prohibit the University or the representative from seeking a temporary restraining order on behalf of other employees at the workplace.

E. Violent Incident Log:

- 1. The Department of Police Services is primarily responsible for maintaining the Log, which will be used to record every workplace violence incident. The Log will include the following information:
 - i. The date, time, and location of the incident.
 - ii. The type or types of workplace violence involved in the incident. (Type 1, 2, 3 and/or 4 as defined in Section IV.H4)
 - iii. A detailed description of the incident.
 - iv. A classification of who committed the violence, including whether the perpetrator was a student, family or friend, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or another perpetrator.
 - v. A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
 - vi. A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - vii. The type of incident, including, but not limited to, whether it involved any of the following:

- 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
 - f. Other
2. Consequences of the incident, including, but not limited to:
- i. Whether security or law enforcement was contacted and their response.
 - ii. Actions taken to protect employees from a continuing threat or from any other hazards identified because of the incident.
 - iii. i) Information about the person completing the Log, including their name, job title, and the date completed.
 - iv. Whether there were any injuries as a result of the incident. If so, describe the injuries.
 - v. Whether emergency medical responders other than law enforcement were contacted. If so, identify the other responding agencies or companies that were contacted.
 - vi. Whether the severity of injuries required reporting to Cal/OSHA. If so, document the date, time and to whom the report was made.
 - vii. If the workplace violence incident occurred at a worksite not under the University's control (excluding work areas under the control of a University auxiliary), a copy of that violent incident log must be provided to the University. The University official who receives that log should note that they received it and when.

- viii. Information about the person completing the Log, including their name, job title, and the date completed.

F. Post-Incident Response and Investigation:

1. After a workplace violence incident, a combination of the following individuals will implement post-incident procedures: the Chief of Police, Emergency Manager, Director Employee Relations, Director of Environmental Health & Safety, Title IX Coordinator and the Risk Manager. Post incident procedures include:
 - i. Visit the scene of an incident as soon as it is safe and practicable.
 - ii. Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
 - iii. Review security footage from existing security cameras, if applicable.
 - iv. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
 - v. Determine the cause of the incident.
 - vi. Take corrective action to prevent similar incidents from occurring.
 - vii. Record the findings and ensure corrective actions are taken.
 - viii. Obtain any reports completed by law enforcement.
 - ix. Review all previous similar incidents for pattern and learning.
 - x. Update the “Emergency Procedures for Students, Faculty and Staff” shown [here](#).
 - xi. Ensure that personal identifying information is safe guarded to the extent possible. This includes information that would reveal the identification of any person involved in a violent incident, such as the person’s name, address, email address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person’s identity.

VI. Workplace Violence Prevention and Mitigation

A. The Emergency Management Team:

The Department of Emergency Management, Human Resources, Department of Police Services, Environmental Health & Safety, University Housing, Equity and Compliance and Risk Management provides collaborative oversight and support to the University in the identification, assessment, and management of threats and/or threatening behavior that may lead to acts of targeted violence against the campus and community. This joint group performs assessment and is called the Emergency Management Team (EMT). The EMT will review the frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.

B. Training:

1. The University will provide training to members of the University community:
 - i. When the WVPP is first established, and then every three years.
 - ii. When a new member joins CSUN.
 - iii. Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.
2. The training will review the definitions set forth in Section IV above and the requirements listed below:
 - i. How to obtain a copy of the WVPP and participate in the development and implementation of the WVPP.
 - ii. How to report workplace violence incidents or concerns to the University or law enforcement without fear of reprisal.
 - iii. The warning signs of potential workplace violence.
 - iv. Workplace violence hazards specific to employees' jobs based on the type of workplace and mitigation measures to prevent physical harm.
 - v. The Log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incidents.
 - vi. Strategies to avoid/prevent workplace violence and physical harm, such as:

- a. How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
- b. Ways to defuse hostile or threatening situations.
- vii. How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
- viii. Post-event trauma counseling for employees desiring such assistance,
- ix. Providing Contact information for persons knowledgeable about the WVPP.

C. Workplace Violence Physical Hazard Identification and Evaluation

1. The Office of Environmental Health & Safety (EHS), in coordination with Department of Police Services, and Emergency Management will oversee the identification of workplace violence physical hazards.
2. Members of the University community can report workplace violence hazards or concerns through the following channels:
 - i. Report A Hazardous or Unsafe Condition using form given [here](#).
 - ii. The Department of Police Services.
 - iii. Anonymously via the University’s Workplace Violence Hotline at (818) 677-TIPS (8477).
3. EHS administrators and staff will review and document the outcomes of all such reports.
4. EHS will coordinate and conduct semi-annual campus walks with the aim of identifying and documenting unsafe physical conditions, including those that may increase the likelihood of a crime. As part of the inspection, the areas reviewed and the administrators and staff who conducted the review will be documented.
5. EHS administrators and staff will also review and assess new or previously unrecognized hazards.
6. EHS along with Department of Police Services and Facilities Management will review for the following:

- i. The need for violence surveillance measures, such as mirrors and cameras (annually).
- ii. Procedures for employee response during a robbery or other criminal act based on lessons learned.
- iii. Procedures for reporting suspicious persons or activities based on lessons learned.
- iv. The effective location and functioning of emergency buttons and alarms (annually).
- v. Posting of emergency telephone numbers for law enforcement, fire, and medical services (annually).
- vi. Inspections after any workplace violence incident, which may include:
 - a. The adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
 - b. The 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.
 - c. The availability of employee escape routes.
 - d. 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.
 - e. The frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
 - f. Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.

D. Workplace Violence Physical Hazard Correction:

The Department of Police Services will oversee the evaluation and timely correction of identified workplace violence physical hazards.

1. All corrective actions taken will be documented, dated, and recorded.
2. Corrective measures for workplace violence hazards will be specific to a given work area. For example, these may include:
 - i. Improving lighting around and within the workplace.
 - ii. Installing and utilizing surveillance measures, such as cameras and mirrors, to provide information about activities inside and outside the workplace and to deter criminal activity. These actions will be consistent with the CSU Video Security Cameras policy.
 - iii. Providing workplace violence systems, such as door locks, secure windows, physical barriers, emergency alarms, and restraint systems.
 - iv. Posting emergency telephone numbers for law enforcement, fire, and medical services.
 - v. Installing effective systems to warn others of a potential violence danger or to summon assistance, e.g., alarms or panic buttons.

E. Workplace Violence Procedural update focused on Hazard Identification, Evaluation, and Correction

1. Human Resources will coordinate and conduct annual reviews of employment practices to mitigate and reduce the likelihood that such practice could underlie a threat or act of violence.
2. Members of the University community may report unsafe work practices or other workplace violence concerns using the following means:
 - i. The University's Workplace Violence Hazard Reporting Form given [here](#).
 - ii. The Department of Police Services.
 - iii. Anonymously via the University's Workplace Violence Hotline at (818) 677-TIPS (8477).
3. Human Resources administrators and staff will review and document the outcomes of all such reports.
4. Human Resources administrators and staff will also review and assess new or previously unrecognized work practice hazards.

5. The University will mitigate and/or reduce such practices in a timely manner based on severity of the hazard.

VII. Responsibilities:

The following administrative positions have the authority and responsibility for implementing all or specific portions of the WVPP.

- A. **Vice President for Administration and Finance:** This role is responsible for the implementation and overall coordination of the University's WVPP, which includes assessing the effectiveness of the WVPP as well as its compliance with all applicable federal, state, and CSU laws and regulations.
- B. **Director of Environmental Health and Safety:** This role is responsible for ensuring the functionality of procedures established to identify and receive reports related to physical workplace violence hazards and the engagement of members of the university community in identifying, evaluating and correcting physical workplace violence hazards. Other duties include:
 1. Maintain records of physical hazard inspections outlined in section VI.C.3.
 2. Maintain records of workplace violence hazards assessment, review and correction.
 3. Ensure the implementation of corrective actions/engineering controls to confirmed workplace violence physical hazards.
 4. Communicate to members of the University community regarding any corrective measures taken regarding workplace violence physical hazards.
 5. Ensure that all training associated with the WVPP meets all applicable federal, state, and CSU laws and regulations.
 6. Conduct all required assessments, which include:
 - i. When the WVPP is initially implemented
 - ii. Annually
 - iii. After an act of workplace violence
 - iv. When a new hazard becomes known

7. Ensure the University's Injury and Illness Prevention Plan (IIPP), including the WVPP, meet the requirements set forth in Labor Code Section 6401.7.
 8. Ensure that the WVPP is available and easily accessible at all times, meets the requirements of Labor Code 6401.9, and is incorporated into the University's IIPP.
- C. **Assistant Vice President, Human Resources:** This role is responsible for ensuring the functionality of procedures established to identify and receive reports related to work practice workplace violence hazards and the engagement of members of the University community in identifying, evaluating and correcting work practice workplace violence hazards. Other duties include:
1. Maintain records of Work practice workplace violence hazards assessment, review and correction.
 2. Communicate to members of the University community regarding any corrective measures taken regarding work practice workplace violence hazards.
 3. Investigate reported acts or threats of violence forwarded from the from CSUN Police Services.
 4. Develop procedures to address swiftly any retaliation of those who submitted reports.
- D. **Chief of the Police:** This role is responsible for implementing measures to ensure the University is prepared to respond to, investigate, and potentially mitigate workplace violence incidents. Other responsibilities include:
1. Developing procedures on how workplace violence investigations will be conducted, recorded, and the results thereof widely disseminated.
 2. Receiving and investigating all reports of acts or threats of violence.
 3. Recording reports of acts or threats of violence in the Log and maintaining the Log.
 4. Issuing timely notices of workplace violence emergencies, including instructions for how members of the University community should respond to such emergencies.
 5. Chairing the Emergency Management Team.
- E. **Emergency Manager:** This role is responsible for developing and implementing procedures on how to respond to violent emergencies, including evacuation and/or

sheltering in place plans. Other duties include assisting the Clery Director in issuing emergency warnings related to workplace violence incidents. Other responsibilities include:

1. Ensuring opportunities exist for the active engagement of members of the University community in the development and ongoing review of the WVPP and the development and functionality of reporting mechanisms.
2. Participating in University efforts regarding post-incident response and review.
3. Coordinating all required Plan reviews, which include reviews annually, after a workplace violence incident, and when a new hazard becomes known.

F. Director of Physical Plant Management: This role is responsible for ensuring the implementation of corrective actions to confirmed workplace violence hazards.

G. Director, Contracts & Procurement: This role is responsible for coordinating the implementation of the WVPP with other employers who have employees on the campus of the University.

H. Management Plan Personnel: All MPPs and appropriate administrators have primary responsibility for implementing and maintaining the WVPP in their administrative areas, ensuring that faculty and staff have access to training and written materials concerning University safety policies, procedures, and practices; assault prevention; and guidelines for resolving violent confrontation. Additional responsibilities include:

1. Informing Department of Police Services of all threats or acts of violence, even if the situation has been resolved.
2. Encouraging faculty and staff to participate in campus workplace violence training seminars.
3. Discussing regularly with all personnel issues related to workplace security.
4. Training and/or counseling faculty and staff whose performance is deficient in complying with work practices designed to increase workplace security.

I. Members of the University Community: All members of the University community are responsible for using safe work practices, following all University directives, policies, and procedures concerning campus security, and assisting in maintaining a safe and secure work and learning environment. All are strongly encouraged to review and become familiar with materials concerning campus security and participate in campus workplace violence training. To encourage faculty, administrators, and staff to comply with work practices designed to make the workplace more secure and to not

engage in threats or physical actions which create a workplace violence hazard for others on campus, the University will:

1. Communicate and provide training concerning the WVPP.
2. Recognize members of the community who perform practices that promote safety and/or mitigate the risks of workplace violence.
3. Provide training and/or counseling to members of the community whose performance is deficient in complying with work practices designed to enhance workplace security.
4. Discipline workers for failure to comply with workplace violence practices, ensuring adherence to collective bargaining agreements.

VIII. General Provisions:

A. Employee and Student Involvement: The University will take the following measures to obtain the active involvement of employees, authorized employee representatives, and students in developing and implementing the WVPP:

1. Ensure employees, authorized employee representatives, and students have opportunities to participate in: a) Identifying, evaluating, and determining corrective measures to prevent workplace violence. b) Designing training. c) Reporting workplace violence incidents.
2. Communicate all policies and procedures within the WVPP to all employees and students.
3. Require all employees and students to follow the WVPP and assist in maintaining a safe work and learning environment.
4. Ensure the WVPP addresses the hazards and corrective measures for all work areas/operations and learning environments.

B. Employee and Student Compliance: To ensure that employees and students comply with the WVPP and do not engage in threats or physical actions that create a workplace violence hazard for others in the workplace, the University will:

1. Train employees and students regarding the elements of the WVPP.
2. Develop and implement measures to promote compliance with the WVPP.

3. Retrain employees and students whose safety performance is deficient with the WVPP.
4. Recognize employees and students who demonstrate safe work practices that promote the WVPP in the workplace.
5. Counsel and/or discipline employees or students for failure to comply with the WVPP, ensuring compliance with collective bargaining agreements and student conduct procedures.

C. Access to the Written WVPP and Requested Records

1. The WVPP will be in writing and available and easily accessible to members of the University community, authorized employee representatives, and representatives of Cal/OSHA always on the University's website.
2. The University will make the following records available to employees, employee representatives, and students, upon request and without cost, for examination and copying within 15 calendar days of a request:
 - i. Records of workplace violence hazard identification, evaluation, and correction.
 - ii. Training records.
 - iii. Violent incident logs.
 - iv. Requests should be made to the Office of Risk Management and Compliance.

D. Recordkeeping

1. EHS will create and maintain records of workplace violence hazard identification, and evaluation for a minimum of five (5) years.
2. Human Resources will create and maintain training records for a minimum of one (1) year and include the following: a) Training dates. b) Contents or a summary of the training sessions. c) Names and job titles of all people attending the training sessions.
3. Department of Police Services will create and maintain records of workplace violence hazard correction, for a minimum of five (5) years.

4. Department of Police Services will maintain violent incident logs and workplace violence incident investigations for a minimum of five (5) years. These records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
5. The University will make all records of workplace violence hazard identification, evaluation, and correction; training, incident logs, and workplace violence incident investigations required by LC section 6401.9(f), available to Cal/OSHA upon request for examination and copying.

E. WVPP Review

1. Human Resources, Department of Police Services, EHS and Risk Management will ensure that the WVPP is reviewed for effectiveness:
 - i. At least annually.
 - ii. When a deficiency is observed or becomes apparent.
 - iii. After a workplace violence incident.
2. Review and revision of the WVPP will include:
 - i. Review of incident investigations and the Log.
 - ii. Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).
 - iii. Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees.
3. **Coordination with Other Employers:** The University, through its Office of Contracts & Procurement, will communicate the WVPP to other employers on campus to ensure that those employers and their employees understand their respective roles as provided in the WVPP, which includes the reporting and investigation of any potential workplace violence incident.

IX. Accountability:

- A. Any faculty, staff, student, or volunteer who engages in an act or threat of violence or who retaliates against another member of the University community for reporting a workplace violence incident or concern is subject to disciplinary action

under university policies and/or applicable collective bargaining agreements, up to termination or expulsion.

- B.** If a contractor, vendor, or visitor engages in an act or threat of violence or retaliates against another member of the University community for reporting a workplace violence incident or concern, they may be barred from university-owned or leased property and have their business relationship with the University suspended or terminated.

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