



Workplace Violence Prevention Plan (WVPP)

I. Purpose

This Workplace Violence Prevention Plan (“WVPP” or “Plan”) addresses and implements corrective measures for workplace violence hazards specific to California State Polytechnic University, Humboldt’s (the “University” or “Cal Poly Humboldt”) work areas and operations. The purpose of this Plan is to: identify the names and job titles of the persons responsible for the implementation and maintenance of the WVPP, highlight how employees can report violent workplace incidents, threats, or other workplace violence concerns, and how to respond to reports, reinforce against unlawful retaliation for reporting violent incidents, threats, or other workplace violence concerns, and participating in any related investigations of such reports, outline procedures to respond to actual or potential workplace violence emergencies, detail training requirements about this Plan, including the frequency of training, outline procedures to identify and evaluate workplace violence hazards, and communicate post-incident response and investigation processes.

II. Workplace Violence Prevention Requirements

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

III. Scope

The WVPP applies to all University employees, including faculty and staff, as well as volunteers and persons present in University worksites. University worksites include any site where University business is being performed under the control of the University. The WVPP does not apply to University employees when telecommuting from a location of the employee’s choice, not under the control of the University. University auxiliary organizations are responsible for applying similar practices to their respective employees, programs and activities.

IV. Definitions

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, regardless of whether an individual sustains an injury.
2. An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether an individual sustains an injury.

3. The following four types of violence based on who commits the violence:
 - a. Type 1: Anyone with no business relationship to the workplace or employees.
 - b. Type 2: By customers or clients who receive services from the affected workplace or victim (i.e. patrons or students).
 - c. Type 3: Co-workers who have some employment- related involvement with the workplace. This can include a current or former employee, supervisor or manager.
 - d. Type 4: Someone the victim (an employee) has a personal relationship with outside of work. This can include current or former spouse/partner, relative, friend or acquaintance.
4. Workplace violence does not include lawful acts of self defense or defense of others.

A. Reporting Workplace Violence

1. Members of the University community who witness or perceive an act of violence or a threat of violence on campus may report that incident of workplace violence or other workplace violence concern using one of the following methods:
 - a. Call 911 (when safe to do so).
 - b. Text UPD through the RAVE GUARDIAN app. This can also be submitted anonymously.
 - c. Notify their supervisor, lead, or appropriate administrator.
 - d. Submit a safety/action suggestion form to environmental health and safety which can be found here:
<https://risksafety.humboldt.edu/safety-suggestionaction-form>.
 - e. Submit a referral to the campus threat assessment team through the campus complaints form <https://reporting.humboldt.edu/>.
2. 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, including and up to dismissal, non-retention, expulsion and/or removal from campus.
3. 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 take the following actions:
 - a. Ensure that the WVPP is discussed during new employee, student and volunteer orientations.

- b. Require University employees, University auxiliary employees and employees of other employers who work on campus to complete workplace violence prevention training. Make available annually in person training to the University community to participate in.
- c. Require all departments and administrative units to at least annually discuss, review and communicate to their employees the security protocols and workplace hazards and mitigation in their work areas.
- d. Post and distribute workplace violence prevention information on employee and student portals.
- e. Communicate in writing at the beginning of the semester to all members of the University how individuals can report a violent incident, threat, or other workplace violence concern without fear of reprisal or adverse action.

B. Emergency Communication

1. In the event of a workplace violence emergency, the University will communicate through the following means in a manner readily understandable by all members of the University community:
 - a. Send alerts to members of the University community through the Timely Warning, Emergency Notification and/or Safety Bulletin process.
 - b. Broadcast alerts through the emergency alert systems.
2. Where or when additional information may be obtained, these alerts will:
 - a. Provide the presence, location and nature of the workplace violence emergency.
 - b. Note evacuation or sheltering plans appropriate and feasible for the situation.
 - c. Inform recipients how to obtain assistance from UPD or other law enforcement agencies.
 - d. Include any other information that is required by applicable federal and state laws and regulations, as well as CSU and/or University policies.

C. Violent Incident Log

1. The UPD is primarily responsible for maintaining the log, which will be used to record every workplace violence incident. The Log will include the following information:
 - a) The date, time, and location of the incident.
 - b) The workplace violence category type or types involved in the incident, as defined above (i.e., Type 1, 2, 3 or 4).

- c) A detailed description of the incident.
- d) A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or another perpetrator.
- e) 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.
- f) A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
- g) The type of incident, including, but not limited to, whether it involved any of the following:
 - 1. Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - 2. Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - 3. Threat of physical force or threat of the use of a weapon or other object.
 - 4. Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - 5. Animal attack.
 - 6. Other.
- h) Consequences of the incident, including, but not limited to:
 - 1. Whether security or law enforcement was contacted and their response.
 - 2. Actions taken to protect employees from a continuing threat or from any other hazards identified because of the incident.
 - 3. Whether there were any injuries as a result of the incident, and if so, a description of the injuries.

Whether emergency responders other than law enforcement were contacted, such as Fire Department, Paramedics, or on-site first-aid certified personnel, and if so, a brief explanation of their involvement.

The Log will also include information about the person completing the Log, including their name, job title, and the date completed but will not include personal identifying information that would identify any person involved in a violent incident. A copy of the log will be provided upon request within 15 business days.

D. Post Incident Response and Investigation

After a workplace violence incident, the campus Threat Assessment Team will conduct an after action which will review the following elements:

1. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
2. Determine the cause of an incident.
3. Record the details of the workplace violence incident and findings and ensure corrective actions are taken.

V. Workplace Violence Prevention and Mitigation

A. Campus Threat Assessment Team

The Campus Threat Assessment Team is composed of a multi-disciplinary leadership group that includes the UPD Police Chief, AVP Campus Resilience and Response, Chief HR Officer, Campus General Counsel, AVP Faculty Affairs, Dean of Students, Title IX Coordinator, and the Clery Director.

Preventing violence and supporting the safety of the campus community are responsibilities of all members of the Cal Poly Humboldt community. Campus safety is enhanced through identification of indicators of potential concern and timely sharing of this information with the Threat Assessment Team.

1. The campus threat assessment team is tasked with addressing any reported concerns of violence or potential acts of violence on campus.
2. All immediate life-threatening threats of violence will be the responsibility of UPD to respond to-the Campus Threat Assessment Team may provide support but they are not the first responders.
3. The team will collect information about the potential threat and assess the threat utilizing the WAVR 21 methodology.
4. Potential threats that require assessment will be referred to the Campus Threat Assessment Team who will meet as needed and may be required to meet immediately based upon the threat as deemed by UPD.

5. If the Campus Threat Assessment Team determines an individual is a threat they will create a threat mitigation plan specific to that individual/situation.
6. Roles and responsibilities for the execution of the mitigation plan will be assigned and the team will meet regularly until the threat is deemed to no longer be an active threat to the University community.

B. Training

1. The University will provide training to its employees:
 - a. When the WVPP is first established.
 - b. Annually thereafter.
 - c. When a new employee joins the University.
 - d. Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the WVPP. The additional training may be limited to addressing the new workplace violence hazard or changes to the WVPP.
2. The training will review and explain the definitions set forth in Section IV above and the requirements listed below:
 - a. The WVPP, how to obtain a copy of the WVPP at no cost, and how to participate in development and implementation of the WVPP.
 - b. How to report violence incidents or concerns to the University or law enforcement without the fear of reprisal.
 - c. The warning signs of potential workplace violence.
 - d. Workplace violence hazards specific to work areas at the University, any engineering or work practice controls the University has implemented, how to seek assistance to prevent or respond to workplace violence, and strategies to avoid physical harm.
 - e. Strategies to avoid/prevent workplace violence hazards, including risk factors associated with the four types of workplace violence and ways to defuse hostile or threatening situations.
 - f. How to recognize alerts, alarms or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
 - g. Contact information for persons knowledgeable about the WVPP and the opportunity for interactive questions and answers with such persons.

C. Workplace Violence Physical Hazard Identification and Evaluation

1. Annually and/or when deemed necessary due to the emergence of a newly identified workplace violence hazard, the Campus Threat Assessment Team will oversee the identification of workplace violence physical hazards.
2. EHS/Risk Management will coordinate and conduct campus inspections in conjunction with other required inspections with the purpose of identifying and documenting unsafe physical conditions, including those that may make a crime more likely to occur. EHS/Risk will conduct an inspection when the WVPP is first established, when there is a significant change to a work site or location, after any workplace violence incident and when the department IIPP has identified a potential hazard.
3. The Campus Threat Assessment Team in partnership with Facilities Management representation, will annually meet to discuss and evaluate factors specific to University work areas that may result in risk of workplace violence, such as:
 - a. The need for surveillance measures, such as mirrors or cameras.
 - b. Procedures for employee response during a robbery or other criminal act.
 - c. Procedures for reporting suspicious persons or activities.
 - d. Effective locations and functioning of emergency buttons and alarms.
 - e. Posting of emergency contact information, evacuation procedures and medical assistance equipment.
 - f. Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers and restraint systems.
 - g. Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom an employee may be having a dispute.
 - h. Frequency and severity of related employee reports of threats of physical or verbal abuse by managers, supervisors or other employees.
 - i. Any acts of prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the specific workplace.

D. Workplace Violence Physical Hazard Correction

1. EHS/Risk will direct the evaluation and timely correction of identified workplace violence physical hazards.
2. All corrective actions taken/engineering controls adopted will be documents, dated and recorded.
3. Corrective measures for workplace violence hazards will be specific to a given work area. See Annex A for examples that may be implemented in the future following campus evaluations and/or incidents that may occur.

E. Workplace Violence Unsafe Work Practice Hazard Identification, Evaluation and Correction

1. EHS will coordinate and conduct reviews of employment practices to mitigate and reduce the likelihood that such practice could underlie a threat or act of violence.
2. EHS/Risk administrators and staff will review and document outcomes of all reports and will coordinate mitigation/reduction of such practices in a timely manner based on the severity of the hazard.

VI. Responsibilities

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

VP for Administrative Affairs: The VP for Admin Affairs is responsible for implementation and overall coordination of the University's WVPP, which includes assessing the effectiveness of the WVPP as well as its compliance and applicable federal and state laws and regulations as well as California State University (CSU) and University policies.

Chief of Police for University Police department: The primary responsibility of the Chief is to implement measures to ensure the University is prepared to respond to, investigate, and potentially mitigate workplace violence incidents. Other responsibilities include:

1. Primary responsibility for coordinating the issuance of Emergency notifications related to workplace violence incidents, which will include evacuation and/or sheltering in place instructions when applicable.
2. Record workplace violence incidents in the log and maintain the log.
3. Co-Chair the Campus Threat Assessment Team with AVP of Campus Resilience and Response.

AVP of Campus Resilience and Response: Has primary responsibility for ensuring the functionality of procedures established to identify and receive reports related to workplace violence hazard and the engagement of the Campus Threat Assessment Team in identifying, evaluating, and correcting workplace violence hazards.

1. Maintain records of inspections.
2. Ensure implementation of corrective actions/engineering controls to confirmed workplace violence hazards.
3. Ensure that the [University's Injury and Illness Prevention Plan \(IIPP\)](#), including the WVPP, meets the requirements set forth in Labor code 6401.7.

4. Lead University efforts post-incident response and review.
5. Co-Chair the Campus Threat Assessment Team.
6. Developing and implementing procedures to communicate with members of the University community concerning how to report workplace violence incident or other concern around workplace safety.

AVP of Human Resources: has primary responsibility for ensuring all training associated with the WVPP meets applicable federal and state laws and regulations as well as CSU and University policies and maintaining records of completion of such training.

1. Ensure that opportunities exist for the active engagement of members of the University community and authorized employee representatives in ongoing review of the WVPP.
2. Communicate to members of the University regarding any corrective actions related to work practices for workplace violence hazards.
3. Develop procedures to address swiftly any retaliation of those who submitted reports.
4. Ensure reporting of serious injury or fatality per Title 8 CCR Sections 330(a) and 342.
5. Assess after a workplace violence incident whether providing support and resources such as counseling services would benefit employees or campus community.

Executive Director, Strategic Business Services: Has primary responsibility for coordinating the implementation of the WVPP with other employers who have employees at the University to ensure that those employers and employees understand their roles and receive training

AVP of Facilities Management: Has the responsibility to assist in the identification of physical hazards that could contribute to workplace violence and engage in the mitigation planning and correction of such hazards.

Clery Director: Has the primary responsibility for coordinating the issuance of timely warnings and emergency notifications to alert members of the University community of a workplace violence incident. Other duties include responding to requests for associated workplace violence records.

Campus Threat Assessment Team: Has the primary responsibility to determine if an individual poses, or may reasonably pose, a threat of violence to themselves, others, or the Cal Poly Humboldt community; and to intervene to avert the threat and maintain the safety of the situation. The team responds to potentially threatening behaviors exhibited by students, employees, visitors and non-affiliated persons prior to a critical incident in an attempt to prevent violence to ensure the campus remains a safe and secure learning and working environment.

Management Personnel (MPP) and appropriate administrators: Have primary responsibility for implementing and maintaining the WVPP in their administrative areas, ensuring that university personnel have access to the WVPP and complete required training.

1. All MPPs are responsible for forwarding any reports of workplace violence or threats of workplace violence to UPD, even if the situation has been resolved.
2. Discussing regularly with all personnel issues related to workplace security.
3. Training and/or counseling faculty and staff whose conduct is deficient in complying with work practices designed to increase workplace security.

All University Employees: All employees of the University 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. 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. Provide training and/or counseling to employees whose performance is deficient in complying with work practices designed to enhance workplace security.
3. Discipline workers, as permitted by applicable laws, rules, regulations, policies and collective bargaining agreements, for failure to comply with workplace violence practices.

VII. Accountability

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 the University policies and/or applicable collective bargaining unit agreements up to dismissal or expulsion.

If a contractor, vendor or visitor 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, they may be barred from University-owned or leased property and have their business relationship with the University suspended or terminated.

A. Employee Active Involvement

The University will take the following measures to obtain or attempt to obtain the active involvement of employees and authorized employee representatives in developing and implementing the WVPP:

1. Ensure employees and authorized employee representatives have opportunities to participate in:

- A. Identifying, evaluating, and determining corrective measures to prevent workplace violence.
 - B. Designing and implementing training.
 - C. Reviews of ways of reporting and/or investigating workplace violence incidents.
2. Communicate all policies and procedures within the WVPP to all employees.
 3. All employees are required 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 Compliance

To ensure that employees 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 regarding the elements of the WVPP.
2. Develop and implement measures to promote compliance with the WVPP.
3. Retrain employees whose safety performance is deficient with the WVPP.
4. Counsel and/or discipline employees, as permitted by applicable laws, rules, regulations, policies and collective bargaining agreements, for failure to comply with the WVPP.

C. Access to the Written WVPP and Requested Records

1. The WVPP will be in writing, available and accessible to members of the University community, authorized employee representatives, and representatives of Cal/OSHA, through the University's website.
2. The University will make the following records, subject to redaction of Personal Identifiable Information ("PII"), available to employees, employee representatives, and students, upon request and without cost, for examination and copying within 15 calendar days of a request: a) Records of workplace violence hazard identification, evaluation, and correction. b) Training records. c) Violent incident logs.
3. Requests under the Public Records Act (PRA) should be sent to pra@csumb.edu.

D. Recordkeeping

1. EHS/Risk will create and maintain records of workplace violence hazard identification and evaluation for a minimum of five (5) years.

2. HR 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. EHS/Risk will create and maintain records of workplace violence hazard correction for a minimum of five (5) years.

4. UPD will assure proper record retention and maintain violent incident logs and workplace violence incident investigation materials 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 and will be redacted for PII.

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. The Office of HR, UPD, EHS/Risk will ensure that the WVPP is reviewed for effectiveness:

- a) At least annually,
- b) When a deficiency is observed or becomes apparent,
- c) After a workplace violence incident,
- d) as needed.

2. Review and revision of the WVPP will include:

- a) Review of incident investigations and the Log.
- b) Assessment of the effectiveness of workplace violence hazard prevention such as security systems, including alarms, emergency response, and security personnel availability (if applicable).
- c) Review that violence risks are being properly identified, evaluated, and corrected.

3. Any necessary revisions are made promptly and communicated to all employees. Every effort will be made to ensure active employee involvement in the WVPP review process.

F. Coordination with Other Employers

The University, through Business Support Services, 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.

Annex A

PREVENTATIVE MEASURES TO PROTECT SPACES FROM PHYSICAL THREATS

EXAMPLES

1. Access Control Systems: Implement access control systems such as key cards, biometric scanners, or keypads to restrict entry to authorized personnel only.
2. Staff at entrances: Have a staff member seated at the front of an office suite as a gatekeeper, with secure doors to restrict access further into the office to check in visitors.
3. Security Screening: Install metal detectors, X-ray machines, or other screening devices at entry points to detect weapons or other prohibited items. Space/area protection through canine sweeps for firearms and/or improvised explosive devices (IED).
4. Technology and AI Solutions: Solutions which may detect the presence of weapons by scanning safety and security camera images, shot detection systems to pinpoint the location of weapons discharges, and/or such solutions.
5. Safety and Security Cameras: Ensure that existing camera systems are in good working order regularly. In areas of elevated risk investigate the feasibility of installing surveillance cameras in strategic locations both inside and outside the building to monitor activities and deter potential threats.
6. Physical Barriers: Use physical barriers such as bollards, gates, or turnstiles to control the flow of people and prevent unauthorized access.
7. Emergency Communication Systems: Install emergency communication systems such as intercoms or panic buttons to allow occupants to quickly call for help in case of an emergency.
8. Training and Drills: Provide training for building occupants on how to recognize and respond to security threats. Conduct regular drills to practice emergency procedures. Have brief training in person for campus to review locations of emergency phones and reminders to be aware of your surroundings.

9. Secure Entrances and Exits: Ensure that entrances and exits are secure and equipped with features such as alarms or automatic locks to prevent unauthorized access or forced entry. Lock buildings or areas during certain hours.

10. Physical Surroundings: Ensure there is adequate lighting in buildings, outside of buildings, parking lots/structures, etc. Assess benefits of installing motion detected lighting. Ensure vegetation adjacent to entrances and walkways are trimmed regularly to deter individuals from hiding in these areas.

11. Visitor Management: Implement a visitor management system to track and monitor visitors entering the building. Require all visitors to sign in and wear identification badges.

12. Assistance from UPD: Request dedicated or heightened patrol services from the campus UPD during events that pose an increased risk of violence. Ensure campus community is aware they can call UPD if they feel unsafe about leaving a building alone.

13. Perimeter Security: Secure the perimeter of the building with fencing, gates, or barriers to prevent unauthorized access from outside.

14. Alarms and Alerts: Install audible alarms and visual alerts to notify occupants in case of security breaches or emergencies.

15. Secure Design: Incorporate security features into the design of the building, such as reinforced doors and windows, to make it more difficult for intruders to gain access.

16. Regular Inspections and Maintenance: Conduct regular inspections of security systems and infrastructure to identify any vulnerabilities or weaknesses that need to be addressed.

17. Community Engagement: Foster a sense of community among building occupants to encourage vigilance and cooperation in maintaining security. Regularly send out communications related to encouraging the campus community to report concerns of physical violence, EAP resources, domestic violence awareness, dating abuse, etc.

18. Remote Work and "Teleworking": The Workplace Violence Prevention Plan legislation exempts locations from the requirement where employees are "teleworking" from a location of their choosing, and which is not under the control of the employer.