

**Cal Poly Pomona
Workplace Violence Prevention Plan**

Date of Last Review: July 1, 2024

Date of Last Revision:

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, Pomona’s (the “University” or “Cal Poly Pomona”) 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. 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 auxiliaries are responsible for applying similar practices to their respective programs and activities.

IV. **Accountability**

Any University employee who engages in an act or threat of workplace 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 and including non-retention or expulsion. If a contractor, vendor, volunteer, or visitor engages in an act or threat of workplace 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.

V. Definitions

The following definitions apply to this Plan:

- A. **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.
- B. **Emergency:** Unanticipated circumstances that can be life threatening or pose a risk of significant injuries/harm to employees or other persons.
- C. **Engineering Controls:** An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.
- D. **Log:** The violent incident log required by Labor Code Section 6401.9.
- E. **Workplace Violence:** Any act or threat of violence that occurs in a place of employment. This term encompasses, but is not limited to, the following:
 - 1. The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless 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 such as weapons, regardless of whether an injury is sustained.
 - 3. Workplace violence falls into four categories, depending on the status of the person(s) committing the act:
 - 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.
 - iii. **Type 3 Violence:** Workplace violence against an employee by a present 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 a University employee.
 - 4. The term “workplace violence” does not include lawful acts of self-defense or defense of others.
- F. **Work Practice Controls:** Procedures and rules which are used to effectively reduce workplace violence hazards.

VI. Workplace Violence Incidents

A. Reporting Acts or Threats of Workplace Violence and University Actions

- 1. University employees who witness or perceive an act of workplace violence or a threat of workplace violence on campus are encouraged to report such incidents of workplace violence through one or more of the following channels: a) dial 9-1-1 (when safe to do so); b) use the Emergency Blue Phones on campus; c) report to their appropriate administrator.
- 2. University employees who witness or perceive an act of workplace violence or a threat of workplace violence on campus can also report such incidents of workplace violence to the Cal Poly

Pomona Police Department (UPD) at (909) 869-3070. Anonymous tips can also be submitted by calling Cal/OSHA at (800) 963-9424 or emailing them at InfoCons@dir.ca.gov and/or DOSHEnforcement@dir.ca.gov.

3. For situations that do not involve an actual or imminent act of workplace violence or threat of workplace violence, the incident should be reported promptly by submitting a report to EHS (<https://www.cpp.edu/ehs/occupational-health/workplace-violence-prevention1.shtml>). Employees may also report non-imminent acts to their departmental HEERA manager, Employee/Labor Relations and Compliance at elr@cpp.edu or Faculty Affairs at avpfa@cpp.edu.
4. Individuals can report incidents verbally or in writing; however, a written report containing details about the incident is recommended. Individuals may also report incidents anonymously and Cal Poly Pomona will investigate anonymous reports to the extent possible given the level of detail contained or not contained in the report.
5. Retaliation for reporting an instance of workplace violence is strictly prohibited. Any member of the University community who retaliates against someone for reporting workplace violence is subject to discipline, up to and including non-retention, expulsion, and/or removal from campus.
6. To prepare for a workplace violence emergency and enhance the likelihood that a University employee will report an incident, the University will undertake the following actions:
 - i. Ensure that workplace violence prevention policies and procedures are discussed during new employee and volunteer orientations.
 - ii. Require employees to complete workplace violence prevention 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 using material provided by the WVPP.
 - iv. Post and distribute workplace violence prevention information.
 - v. Communicate at the beginning of the semester to all University employees about how employees 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:
 - i. Alerts will be sent to University employees utilizing the Safety Alert System.
 - ii. Current employees are automatically enrolled in receiving emergency alerts utilizing the contact information provided in BroncoDirect; thus, current employees are encouraged to ensure their contact information is accurate and up to date.
 - iii. The Safety Alert System is comprised of the following modes of communication:
 1. RAVE ENS: The University utilizes the RAVE platform to send emergency alerts via voice or text message to office and mobile phones, as well as personal emails. This platform may also be utilized to send urgent updates as an event unfolds.
 2. University email: Official University email communications will be sent to active cpp.edu email addresses.
 3. Computer pop-up messages: Active University network computers will receive a full-screen pop-up alert notifying the user of the emergency.
 4. Speakerphone broadcast: Emergency messaging may be broadcast over speakerphones of University network phones during an emergency.

5. Cal Poly Pomona website: Emergency notifications and alerts will be displayed on the University website home page.
 6. Emergency Information Hotline: Information and updates will be provided as they are available on the University's Emergency Information Hotline at (866) 869-POLY (7659). University employees are highly encouraged to save this number as a contact in their personal phones.
 7. PolyCentric University News Center: PolyCentric may feature breaking news, updates, announcements of events, and resources.
 8. Electronic Marquees: The University has marquees at campus entrances on Kellogg Drive, near the I-10 offramp, and the corner of Temple Avenue and South Campus Drive which will display pertinent messaging.
 9. Public Safety Officials: University and external public safety officials may provide emergency information.
 10. Written media: Information may be posted throughout the University as needed and appropriate.
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 UPD or other law enforcement agencies.

C. Violent Incident Log

1. The Office of Environmental Health and Safety (EH&S) 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:
 - i. Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.

- ii. Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
- iii. Threat of physical force or threat of the use of a weapon or other object.
- iv. Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- v. Animal attack.
- vi. Other.

h) 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. Whether there were any injuries as a result of the incident, and if so, a description of the injuries.
- iv. 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.

D. Post-Incident Response and Investigation

After a workplace violence incident, a combination of the Chief of Police and Director of Public Safety, or designee, in conjunction with Associate Vice President for Administrative Services, Assistant Vice President Employee/Labor Relations and Compliance, Director of EHS, and/or the Risk Manager, will work together to implement the following post-incident procedures:

1. Work with campus departments to provide supportive measures and/or assistance to the victim(s).
2. Visit the scene of an incident as soon as it is safe and practicable.
3. Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
4. Review security footage from existing security cameras, if applicable.
5. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
6. Determine the cause of the incident.
7. Take corrective action to prevent similar incidents from occurring.
8. Record the findings and ensure corrective actions are taken.
9. Obtain any reports completed by law enforcement.
10. Review all previous similar incidents for patterns and learning.
11. Ensure that personally identifiable information is safeguarded when entering information into the Log or report drafted for the WVPP. 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.

VII. Workplace Violence Prevention and Mitigation

A. Training

- a) The University will provide training to its employees:
 - i. When the WVPP is first established
 - ii. Annually
 - iii. When a new employee joins Cal Poly Pomona
 - iv. 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.

- b) The training will review and explain the definitions set forth in Section V above and the requirements listed below:
 - a) How to obtain a copy of the WVPP and participate in the development and implementation of the WVPP.
 - b) How to report workplace violence incidents or concerns to the University or law enforcement without fear of reprisal.
 - c) Workplace violence hazards specific to employees' jobs based on the type of workplace, any corrective measures the employer has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
 - d) The Log and how to obtain copies of records pertaining to WVPP hazard identification, evaluation and correction, training records, and violent incidents.

EHS will also provide interactive question and answer sessions for University employees with person's knowledgeable about this plan.

B. Workplace Violence Physical Hazard Identification and Evaluation

1. The Office of Environmental Health & Safety (EHS), in coordination with UPD, Facilities Planning and Management, and Risk Management, will oversee the identification of workplace violence physical hazards.
2. University employees can report workplace violence hazards or concerns through the following channels:
 1. Report a Hazardous or Unsafe Condition using the form [here](#)
 2. The University Police Department (UPD) at (909) 869-3070
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 physical workplace hazards, 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 UPD and Facilities Planning and Management will review for the following:

1. The need for security surveillance measures, such as mirrors and cameras (annually).
2. Procedures for employee response during a robbery or other criminal act based on lessons learned.
3. Procedures for reporting suspicious persons or activities based on lessons learned.
4. The effective location and functioning of emergency buttons and alarms (annually).
5. Posting of emergency telephone numbers for law enforcement, fire, and medical services (annually).
6. Physical inspections after any workplace violence incident, which may include:
 1. The adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
 2. The effectiveness of systems and procedures that warn others of actual or potential workplace violence or that summon assistance, e.g., alarms or panic buttons.
 3. The availability of employee escape routes.
 4. 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.
 5. The frequency and severity of employees' 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.

C. Workplace Violence Physical Hazard Correction

The Office of Facilities Planning and Management, in partnership with EHS, UPD, and Risk Management 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 deter criminal activity.
 - iii. Providing workplace security and violence prevention 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.

VIII. 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/CFO: 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 CSU policies and federal and state laws and regulations.

B. Chief of University Police Department (UPD) and Director of Public Safety: Primarily 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 disseminated to the appropriate University stakeholder(s).
2. Receiving and investigating all reports of acts or threats of workplace violence.
3. Recording reports of acts or threats of workplace violence in the Log and providing a copy to EH&S for recordkeeping.
4. Issuing timely notices of workplace violence emergencies and/or emergency notifications consistent with CSU EO 1107 "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act", including instructions for how members of the University community should respond to such emergencies.

C. Associate Vice President, Administrative Services: In support of the Vice President for Administration and Finance/CFO, primarily responsible for planning, coordination, and communications associated with the WVPP as well as ensuring that Cal Poly Pomona's WVPP meets all applicable CSU policies and federal and state laws and regulations. Other responsibilities include:

1. Ensuring opportunities exist for the active engagement of University employees 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. Co-Chairing the WVPP working group.
4. Coordinating all required Plan reviews, which include reviews annually, after a workplace violence incident, and when a new workplace hazard becomes known.

D. Director of Environmental Health and Safety (EHS): Primarily responsible for ensuring the functionality of procedures established to identify and receive reports related to physical workplace violence hazards. Other duties include:

1. Maintaining records of workplace violence physical inspections and violent incident Log.
2. Conducting all required assessments, which include assessments of when the WVPP is initially implemented, after an act of workplace violence, and when a new hazard becomes known.
3. Co-chairing the WVPP working group.
4. Ensuring training meets all compliance requirements.
5. Maintaining the University's OSHA 300 log and ensuring reporting of serious injury or fatality per Title 8 CCR Sections 330(a) and 342.

E. Assistant Vice President Employee/Labor Relations & Compliance: Responsible for addressing violations of CSU/CPP policies by Management Personnel Plan (MPP) employees, student assistants, and represented and non-represented staff. Also responsible for responding to reports of potential work-related injuries or illnesses.

F. Associate Vice President for Faculty Affairs: Responsible for addressing violations of CSU/CPP policies by faculty.

G. Senior Associate Vice President Facilities Planning and Management: Responsible for ensuring the implementation of corrective actions to confirmed workplace violence hazards.

G. Director, Strategic Sourcing and Support Services: The Director, Strategic Sourcing and Support Services, which oversees University contracts and procurement, is primarily responsible for coordinating the implementation of the WVPP with other employers who have employees in the workplace of the University.

I. Emergency Manager: Primarily responsible for developing and implementing procedures on how to respond to violent emergencies, including evacuation and/or sheltering in place plans.

J. Clery Director: Primarily responsible for coordinating the issuance of timely warnings and/or emergency notifications related to workplace violence incidents consistent with CSU EO 1107 “Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act”.

K. WVPP Working Group: Once the WVPP is established and implemented, the WVPP working group will participate in the annual and other reviews/audits associated with the Plan. Working group members include: UPD Chief, AVP Administrative Services, Director EHS, AVP FPM, AVP ELRC, AVPFA, Emergency Manager.

L. 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, and for answering employee questions about the WVPP or directing employees to WVPP resources. Additional responsibilities include:

1. Informing UPD of all threats or acts of violence, even if the situation has been resolved.
2. Encouraging University employees to participate in campus workplace violence training seminars.
3. Regularly discussing issues related to workplace safety and security, including identification of concerns/hazards, discussion of recent incidents and/or reviews of safety procedures with all University employees.
4. Training and/or counseling University employees whose performance is deficient in complying with work practices designed to increase workplace safety and security.

M. 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 working and learning environment. All employees are strongly encouraged to review and become familiar with materials concerning campus safety and 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 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 University employees who perform practices that promote safety and/or mitigate the risks of workplace violence.
3. Provide training and/or counseling to University employees whose performance is deficient in complying with work practices designed to enhance workplace security.
4. Discipline employees, as permitted by applicable laws, rules, regulations, policies, and collective bargaining agreements, for failure to comply with workplace violence practices.

IX. General Provisions

A. Employee 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; and c) reporting workplace violence incidents.
2. Communicate all policies and procedures within the WVPP to all employees.
3. Require all employees 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.

The University Safety Committee, comprised of broad divisional representation, will include WVPP as a standing item for discussion and feedback from committee representatives.

B. Employee Compliance: To promote employee compliance with the WVPP and dissuade employees from engaging 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. Recognize employees who demonstrate safe work practices that promote the WVPP in the workplace.
5. 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 WVPP and Records

1. The WVPP will be in writing and accessible on the University's public facing website, including through a link on the University's home page.
2. The University will make the following records, subject to redaction of personally identifiable information ("PII"), available to employees, employee representatives, and students, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request: a) records of workplace violence hazard identification, evaluation, and correction; b) training records; and c) violent incident logs.
3. Requests should be made to the Office of Environmental Health and Safety (ehs@cpp.edu).

D. Recordkeeping

1. EHS will create and maintain records of workplace violence hazard identification, and evaluation for a minimum of five (5) years.
2. Employee and Organizational Development (EODA) 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 training session attendees.
3. Facilities Planning and Management (FPM) will create and maintain records of workplace violence hazard correction for a minimum of five (5) years.
4. EHS 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 California Civil Code and PII will be redacted.
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 Labor Code section 6401.9(f), available to Cal/OSHA upon request for examination and copying.

E. WVPP Review

1. Under the leadership of the AVP Administrative Services and Director EHS, the WVPP Working Group 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.
2. Review and revision of the WVPP will include a) review of incident investigations and the Log; b) assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable); and c) review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions will be made promptly and communicated to all employees.

F. 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.

****Cal Poly Pomona's WVPP is currently undergoing the meet and confer process with the unions.***