WORKPLACE VIOLENCE PREVENTION PLAN

Cal Poly Pomona Enterprise Inc.
3801 W. Temple Ave Building-55
Pomona, CA 91768

"At the end of the day, the goals are simple: safety and security" ~Jodi Rell

Contents

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Policy Enactment

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321-654-9870

POLICY NAME	Workplace Violence Prevention Plan				
EFFECTIVE DATE	July 1, 2024	DATE OF LAST REVISION	June 28, 2024	VERSION NO.	1

APPLIES TO					
GROUP 1	Administration	GROUP 2	Financial Services	GROUP 3	Marketing
GROUP 4	Employment Services	GROUP 5	Grants	GROUP 6	IT
GROUP 7	Real Estate/CTTI Innovation Village	Group 8	Residential Dining	Group 9	Bookstore
Group 10	Agricultural Enterprises	Group 11	University Village	Group 12	Campus Center Market Place
Group 13	Other Retail Dining	Group 14	CPGE Admin/GEI/Prof. Dev. Admin		

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
IIPP-WVPP-002A	Shari Benson	June 28, 2024	Drafted	Hui Chieng, MS, REHS
IIPP-WVPP-003A	Jared Ceja	6/30/2024	WVPP-Policy Enactment – Final Draft	Hui Chieng, MS, REHS

Policy Statement

CPP Enterprises Inc. (CPPE) acknowledges the necessity of a comprehensive Workplace Violence Prevention Program to mitigate risks associated with various types of workplace violence, as defined by Senate Bill 553. These include:

1. Type I: Violence by individuals without legitimate business at the worksite.
2. Type II: Violence directed at employees by customers, clients, patients, etc.
3. Type III: Violence against an employee by a present or former employee, supervisor, or manager.
4. Type IV: Violence committed by individuals with personal relationships with employees.

CPPE is committed to fostering a safe, respectful, and secure work environment for all employees, students, and visitors. Any behavior that is intimidating, threatening, or potentially violent is disruptive to our objective of maintaining a secure atmosphere. While it is impossible to eliminate all risks, our Workplace Violence Prevention Program aims to educate and empower members of the CPP Enterprises Inc. community to recognize and report concerning behaviors or potentially violent acts. We will take appropriate action, including law enforcement involvement, to address such incidents.

This Workplace Violence Prevention Program does not authorize the adjudication of misconduct, disciplinary actions, or imposition of sanctions on CPPE employees, students, or visitors of the institution. However, individuals whose behavior falls within the scope of this program may be subject to disciplinary measures under CPPE's employee or student disciplinary policies, as well as relevant federal, state, or local laws. It's important to note that while this program provides guidance and standards for maintaining a safe environment, it does not hold the force and effect of law.

Roles & Responsibilities

JOB TITLE(S)/GROUP(S)	ROLE	RESPONSIBILITY
CEO & CHRO	WPV Program Administrators	Responsible for approving the Plan, ensuring compliance, and addressing complaints with the provisions of the program.
CPPE Environmental Health & Safety Manager Human Resources Manager	Administrators	Responsible for ensuring compliance, addressing complaints by implementing approved recommendations, and taking action in cases of violence or threats.
Refer to the Committee Representation Structure table on page 8.	WVPP Committee	Collaboratively assists with evaluating the program's effectiveness, ensuring compliance, and providing consultative support through annual reviews or audits related to the Plan.
Supervisor Manager	Supervisors and Management Personnel	Implementing and maintaining the WVPP within their administrative sectors, ensuring staff are provided access to applicable training and written materials concerning policies and procedures.
All CPPE Employees	Employees	Expected to act professionally, report any acts of workplace violence, and be familiar with reporting procedures without fear of reprisal.
CPPE Management CPP Environmental Health & Safety CPP Risk Management University Police Dept.	University Threat Assessment Team	Reviews alarming behaviors and potential acts of violence, recommends responses per categorization of threat and develops case management strategies.
CPPE Management (*applicable to specific work areas*) CPP Environmental Health & Safety	Site Assessment Team	Conducts initial site assessments for potential threats, and safety hazards, and develops action plans to mitigate risks.

Communication

CPPE maintains open communication channels to disseminate workplace safety and security information to all employees, including:

- Annual review of the Workplace Violence Prevention Program during employee orientation and ongoing training sessions.
- Posting and distribution of workplace violence prevention information throughout the organization.
- Prompt reporting and investigation of threats or violent incidents.
- Active participation in workplace violence prevention/safety committee meetings to address safety concerns and discuss program improvement.

Reporting

All acts or threats of violence are promptly reported to the appropriate authorities, including local law enforcement if necessary. Employees are encouraged to report any safety concerns without fear of retaliation. Reporting procedures include:

- Immediate reporting of threatening situations to supervisors or Human Resources.
- Completion of a Workplace Violence Safety Concern Form detailing the date, time, location, nature of the incident, and individuals involved.
- Provision of psychological assistance and counseling to affected employees. This may be requested by contacting the CPPE Human Resources Manager within the Employment Services Department.
  - Psychological assistance and counseling provider:
    - OPTUM EAP (888) 625-4809; (pre-authorization)
    - OPTUM EAP (866) 342-6892; (emotional support line)

Workplace Violence Emergencies

In case of emergency, employees are advised to take immediate action by dialing 9-1-1 for emergency services. Alternatively, they can utilize campus blue emergency phones or dial extension 3070 for prompt assistance in situations requiring police, medical, fire, or other emergency services.

In the event of emergencies, CPPE response protocols will include:

- Depending upon the magnitude of the situation, activation of the Emergency Operations Center (EOC) team may be necessitated as prescribed within the written Emergency Operations Plan (*Appendix*), and means to alert employees of an incident will be initiated.
  - As a component of the institution's Emergency Operations Plan, alerts are sent to members of the University community through the Safety Alert System (SAS). Members of the University are automatically registered with the SAS upon issuance of their BroncoID at the initial stage of employment. SAS is not limited to EOC occurrences.
  - Employees are encouraged to update emergency contact information in BroncoDirect during their employment.

- Modes of communication comprised within the Safety Alert System involve:

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- o **RAVE Mobile Safety**: Using the RAVE alert provides mass emergency notification via voice or text message to the office, mobile phones, and personal emails. Urgent updates are sent through the system as events progress.
- o **Computer pop-up alerts**: Employee computers connected within the institution's network system receive full-screen pop-up messaging alerting the user of an emergency.
- o **Email Notifications**: Active cpp.edu email addresses will receive Official University communications.
- o **Speakerphone broadcast**: During an emergency, network phones receive broadcast alerts.
- o **CPPE website**: Emergency notifications and alerts will be displayed on the CPPE home page.
- o Additional alerts and instructions may be provided through the institution's Office of Emergency Management, Cal Poly Pomona University's home page, campus electronic marquees, PolyCentric University News Center, both university and external public safety official news outlets, and written media.

It's important to recognize that the descriptive responses provided above come with certain caveats, primarily due to the unpredictable nature of threats, some of which may occur without warning.

Therefore, it's essential to anticipate that information availability during such situations could be severely limited. However, when information is available and appropriate all notifications will minimally include the following:

- Notify employees about the presence and location of emergencies.
- Provide directions that may require immediate evacuation or shelter-in-place as directed by public safety officials.
- Instructions on how to obtain assistance from the University Police Department or external law enforcement authorities.

Hazard Assessment

In collaboration with the Office of Environmental Health & Safety, CPPE conducts regular workplace hazard assessments to identify and evaluate security risks associated with various types of workplace violence. Assessment procedures include:

- Periodic inspections of the exterior and interior of the workplace.
- Evaluation of security measures such as surveillance systems, emergency procedures, and access controls.
- Identification of potential hazards specific to each type of workplace violence.

The assessments are conducted as follows:

- When the Workplace Violence Prevention Program is implemented
- As new, or previously unidentified security hazards are recognized
- When occupational injuries or threat of injury occur
- Whenever the security of the workplace warrants an inspection

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This section outlines the components of each Type of Workplace Violence category inspection in detail.

CATEGORY	SCOPE	INSPECTION DETAIL
TYPE I	Security Surveillance Measures	Identifying the need for security surveillance tools like mirrors or cameras to monitor and deter suspicious activities or individuals. These measures enhance visibility and provide real-time monitoring of potential security threats
	Employee Response Procedures	Evaluating both exterior and interior spaces of the workplace to identify vulnerabilities or attractiveness to potential threats or malicious actors. This includes assessing factors such as lighting, access points, and landscaping that may facilitate criminal activities.
	Reporting Suspicious Persons or Activities	Implementing procedures for employees to report any suspicious individuals or activities observed within the workplace. Encouraging prompt reporting helps in early detection and prevention of potential security threats
	Emergency Telephone Numbers	Ensuring that emergency telephone numbers for law enforcement, fire, and medical services are prominently posted where employees can easily access them. This facilitates swift response and assistance from emergency services during critical situations.
TYPE II	Assessment of Workplace Access and Movement	Evaluating the accessibility and freedom of movement within the workplace to identify any potential vulnerabilities or areas where unauthorized individuals may gain entry.
	Evaluation of Security Systems	Assessing the adequacy of existing workplace security systems, including door locks, security windows, and physical barriers. This includes determining if these systems are effectively preventing unauthorized access and enhancing employee safety.
	Analysis of Threatening Situations	Examining the frequency and severity of threatening or hostile situations within the workplace that could escalate into violent acts by individuals who receive services from CPPE. This assessment helps in understanding the level of risk associated with interactions with service recipients.
	Assessment of Employee Skills	Evaluating employee's proficiency in safely managing threatening or hostile situations involving service recipients. This includes assessing their ability to de-escalate conflicts and follow established protocols for handling such incidents.
	Effectiveness of Warning Systems	Reviewing the effectiveness of systems and procedures in place to alert others of security dangers or to request assistance during emergencies. This may involve assessing the functionality of alarms, panic buttons, or other alert mechanisms.
	Procedures for Emergency Events	Examining the procedures in place for implementing a "buddy" system during specified emergency events. This involves establishing protocols for employees to support each other and ensure safety during emergencies.
	Evaluation of Evacuation Routes	Assessing the availability and accessibility of employee evacuation routes in case of emergencies. This includes ensuring that evacuation routes are clearly marked, and unobstructed, and lead to safe assembly points outside the workplace.
Type III & IV	Communication Assessment	Evaluating CPPE's communication channels with employees, supervisors, and managers to ensure effective dissemination of information regarding workplace violence prevention and response protocols.
	Knowledge of Warning Signs	Assessing the level of awareness among employees, supervisors, and managers regarding warning signs of potential workplace violence. This includes identifying behaviors or indicators that may precede violent incidents.
	Access Controller Non-Employees	Reviewing access control measures to prevent unauthorized entry or movement within the workplace by non-employees, including former employees or individuals involved in disputes with current employees.

	Frequency of Threat Reports	Analyzing the frequency and severity of reported threats of physical or verbal abuse by managers, supervisors, or other employees. This involves identifying patterns of behavior that may indicate underlying issues contributing to workplace violence.
	Review of Past Incidents	Examining records of previous violent acts, threats, verbal abuse, property damage, or other signs of tension or pressure within the workplace. This helps

Incident Investigations

Procedures are in place to thoroughly investigate incidents of workplace violence, including threats and physical injuries. Investigation steps include:

- Reviewing previous incidents to identify patterns or trends
- Interviewing affected employees and witnesses.
- Examining the workplace for security risk factors and addressing any deficiencies.
- Taking corrective actions to prevent recurrence and reviewing outcomes with involved parties.
- Acquiring and reviewing any records completed by law enforcement.
- Documenting the incident within a written report and recording within an incident log.
- When requisitions of investigation reports occur, CPPE will ensure that no personal identifying information is released in the written investigation report. This includes information that may reveal the identity of any person involved such as:
  - Person's name
  - Address
  - Electronic Mail Address
  - Telephone number
  - Social Security Number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

Hazard Correction

Hazards threatening employee security are promptly corrected based on severity and type of workplace violence or concern. Corrective measures include:

- Implementing security measures to deter criminal acts and improve employee safety.
- Providing training to employees on emergency action procedures and threat recognition.
- Enhancing communication systems and access controls to prevent unauthorized entry.
- Initiating the administrative process of acquiring a Temporary Restraining Order, or Restraining Order through University Police Department standardized procedures.

Training and Instruction

All employees receive comprehensive training on workplace safety and security practices, administered through the University's Learning Management System (SumTotal). Training content includes:

- Overview of the Workplace Violence Prevention Program and associated terminology
- Recognition of workplace violence hazards and strategies to prevent or respond to violent acts.
- Reporting procedures for workplace violence incidents or concerns.

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- Annual review of training materials and additional instruction as needed based on identified hazards or new risks.
- Procedures for accessing copies of records on hazards, evaluations, training records, and incident logs.

The training curriculum is provided to all employees during onboarding and can be accessed here.

Review of this Plan

The Workplace Violence Prevention Program and incident logs are reviewed annually to ensure effectiveness and compliance with regulations. Employee input and authorized representatives' involvement are encouraged during the review process to identify areas for improvement.

Active Involvement

Employee involvement is crucial for maintaining a safe work environment. Employees and authorized representatives may participate in plan development, hazard correction, and annual reviews of the WVPP and assessments, including safety committee participation, submitting concerns or feedback, and expressing interest in serving on review committees.

Committee Representation Structure	
No. of Representatives	CPPE Unit Area
1	Bronco Student Center
1	Campus Center
1	Centerpointe
3	CPPE Administration Support Units
1	CTTI/IBW/Real Estate
1	Kellogg West Hotel Conference
1	University Village/Facilities

Recordkeeping & Accessing Records

CPP Enterprises Inc. maintains detailed records of workplace violence prevention activities, including hazard assessments, training sessions, incident investigations, and violent incident logs. Records are retained for a **minimum of 5 years**.

- The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code

Employees and their representatives may request and without cost, for examination and copying of the following records within **15 calendar days of a request:**

- Records of workplace violence hazard assessments, evaluation, and correction
- Training records
- Violent incident logs

A copy of the WVPP shall be kept in writing and made available and accessible at all times. Additionally, the digital format will be maintained on the CPPE intranet database and the Office of Environmental Health & Safety website for immediate access.

Records requests may be submitted to the Human Resources department by email to fdnhr@cpp.edu or by phone at 909-869-4204.

Violent Incident Log

The log will include the following information:

- Date/Time/Location of the incident
- The workplace violence type or types involved in the incident
- A detailed description of the incident. This may include:
    - Threat of physical force or threat of the use of a weapon or other object
    - Physical attacks without a weapon (e.g., biting, choking, grabbing, etc.).
    - Attack with a weapon or object
    - Sexual assault or threat (e.g., rape, attempted rape, physical display, or unwanted verbal or physical sexual contact)
    - Animal attacks
    - Other
- Classification of the perpetrator (e.g., client, customer, friend, coworker, etc.).
- Classification of circumstances at the time of the incident (e.g. working regular job duties, rushed, working during low staffing, isolated/alone, working in an unfamiliar or new location, poorly lit area, etc.).
- Classification of the location where the incident occurred.
- Whether security or law enforcement was contacted.
- Actions taken by the employer to protect the employee or other hazards identified because of the incident.
- Information about the person completing the log, including name, job title, and date completed.

Note: The log must not include any personal identifying information that may sufficiently identify any person involved with the violent incident.

Definitions

"Emergency" refers to unanticipated circumstances that can be life-threatening or pose a risk of significant injuries to employees or other individuals.

"Engineering controls" denote an aspect of the built space or a device designed to eliminate a hazard from the workplace or establish a barrier between the worker and the hazard.

"Log" signifies the violent incident log mandated by this section.

"Plan" signifies the workplace violence prevention plan required by this section.

"Threat of violence" encompasses 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 is reasonably perceived to convey an intent, to cause physical harm or instill fear of physical harm in someone, and that serves no legitimate purpose.

"Workplace violence" encompasses any act of violence or threat of violence occurring in a place of employment.

"Workplace violence" excludes lawful acts of self-defense or defense of others.

"Workplace violence" includes, but is not limited to, the following:

- The threat or use of physical force against an employee resulting in, or having a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- 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 the employee sustains an injury.
- The following four (4) workplace violence types:
  - **"Type 1 violence,"** indicating workplace violence committed by a person with no legitimate business at the worksite, including violent acts by anyone entering the workplace or approaching workers with the intent to commit a crime.
  - **"Type 2 violence,"** denoting workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
  - **"Type 3 violence,"** refers to workplace violence against an employee by a present or former employee, supervisor, or manager.
  - **"Type 4 violence,"** signifying 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 employee.

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WORKPLACE VIOLENCE INCIDENT LOG

DATE	TIME	LOCATION	DETAILED DESCRIPTION OF THE INCIDENT	WORKPLACE VIOLENCE TYPE				WHERE INCIDENT OCCURRED?
				1	2	3	4	

CLASSIFICATION OF PERPETRATOR:	☐ Client ☐ Customer ☐ Family of client ☐ Friend of client ☐ Family of customer ☐ Friend of customer ☐ Stranger	☐ Co-worker ☐ Supervisor/manager ☐ Partner/spouse ☐ Parent ☐ Relative ☐ Other: _____	**CLASSIFICATION OF CIRCUMSTANCES AT TIME OF INCIDENT:**	☐ Performing usual job duties ☐ Poorly lit areas ☐ Rushed ☐ Isolate/alone ☐ Unable to get help/assistance. ☐ Working in unfamiliar/new loc. ☐ Rushed ☐ Low staffing level ☐ Working in community setting ☐ Other: _____
TYPE OF INCIDENT:	☐ Physical attack without a weapon ☐ Attack with a weapon or object ☐ Animal attack ☐ Threat of physical force or threat of the use of a weapon or other object ☐ Sexual assault or threat (including rape, attempted rape, physical display, or unwanted verbal or physical sexual contact) ☐ Other			

CONSEQUENCES OF INCIDENT:	**Was security contacted?**	☐ Yes ☐ No	**RESPONSE:**	
	Was law enforcement contacted?	☐ Yes ☐ No	**RESPONSE:**	
	Action taken to protect employees from a continuing threat or other hazards as a result of the incident:			

COMPLETED BY:		**JOB TITLE:**		**DATE COMPLETED:**