Workplace Violence Prevention Program

DEPARTMENT OF OPERATIONS
OFFICE OF SECURITY
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The California Health Sciences University Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by Labor Code (LC) section 6401.9.

Date of Last Review: June 1, 2024

Date of Last Revision(s): June 1, 2024

DEFINITIONS

**Emergency** - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

**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.

**Log** - The violent incident log required by LC section 6401.9.

**Plan** - The workplace violence prevention plan required by LC section 6401.9.

**Serious injury or illness** - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.
**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.

**Workplace violence** - Any act of violence or threat of violence that occurs in a place of employment.

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

- 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 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 workplace violence types:
  
  **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 or approaches employees with the intent to commit a crime.

  **Type 2 violence** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

  **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.

  **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 employee.

**Workplace violence** does not include lawful acts of self-defense or defense of others.

**Work practice controls** - Procedures and rules which are used to effectively reduce workplace violence hazards.
RESPONSIBILITY

The WVPP administrator, Carlita Romero-Begley, VP of Human Resources, has the authority and responsibility for implementing the provisions of this plan for California Health Sciences University. If there are multiple persons responsible for the plan, their roles will be clearly described.

<table>
<thead>
<tr>
<th>Responsible Persons</th>
<th>Job Title/Position</th>
<th>WVPP Responsibility(ies)</th>
<th>Phone #</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flo Dunn</td>
<td>President</td>
<td>President Dunn will review and approve the final plan and any changes that must be implemented.</td>
<td>559-549-6363</td>
<td><a href="mailto:fdunn@chsu.edu">fdunn@chsu.edu</a></td>
</tr>
<tr>
<td>Carlita Romero-Begley</td>
<td>Vice President for Human Resources</td>
<td>Responsible for employee involvement and training; Carlita or her designee organizes safety meetings, updates training materials, and handles any reports of workplace violence.</td>
<td>559-282-8747</td>
<td><a href="mailto:cromerobegley@chsu.edu">cromerobegley@chsu.edu</a></td>
</tr>
<tr>
<td>Matthew Basgall</td>
<td>Director of Security</td>
<td>Responsible for emergency response, hazard identification, and coordination with other employers; Matthew conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.</td>
<td>559-701-2131</td>
<td><a href="mailto:mbasgall@chsu.edu">mbasgall@chsu.edu</a></td>
</tr>
</tbody>
</table>

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

EMPLOYEE ACTIVE INVOLVEMENT

California Health Sciences University ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

• Administration will work with and allow employees and authorized employee representatives as designated by the University to participate in:
  ☑ Identifying, evaluating, and determining corrective measures to prevent workplace violence.

University administration will have safety meetings with employees and their representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them.
These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.

Designing and implementing training

Employees are encouraged to participate in designing and implementing training programs, and their suggestions are incorporated into the training materials. This could be scenario-based training, video training, in person training on workplace or any other form of training deemed beneficial.

University administration will ensure that annual training on workplace violence will be conducted.

- University administration will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.

- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment. Refer to the CHSU Emergency Action Plan for further information.

- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

EMPLOYEE COMPLIANCE

Our system to ensure that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

- Training employees, supervisors, and managers in the provisions of California Health Sciences University Workplace Violence Prevention Plan (WVPP)

- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.

- Provide retraining to employees whose safety performance is deficient with the WVPP.

- Discipline employees for failure to comply with the WVPP.
COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between administration, faculty, and staff, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between university administration and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns.
- Posted or distributed workplace violence prevention information.
- Employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
  - Employees can anonymously report a violent incident, threat, of other violence concerns. This can be done through direct contact with the Director of Security, Human Resources, or via the website using the Concern Form.
  - Emergency Response Posters are posted throughout the workplace.
  - Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees’ concerns presented to CHSU Administration will be investigated in a timely manner and they will be informed of the completion of the investigation and any corrective actions to be taken.

**Example:**
Employees will be advised concerning investigations initiated by CALOSHA or other external regulatory agencies related to workplace violence issues. Employees who initiate contact with CALOSHA or other regulatory agency will be provided with updates from CALOSHA or other regulatory agency on the status of such investigations consistent with the policies of CALOSHA or other regulatory agency.
Where information is not subject to confidentiality concerns or is otherwise privileged, CHSU may provide updates on the status of investigations and corrective actions are provided to employees through email or and at safety meetings. These updates could include non-privileged, public information about the progress of investigations, the results of investigations, and any corrective actions taken.

**WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

California Health Sciences University will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee’s supervisor, who will inform the Director of Security, VP of Human Resources, or either of their designees.
- The employee also may report incidents directly to Director of Security, or their designee.
- At any time a person feels threatened they can and should call 911 first.
- Employees can report incidents anonymously online website through the Concern Form.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively.

**EMERGENCY RESPONSE PROCEDURES**

California Health Sciences University has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies through the use of the Rave and Alertus Emergency Response Systems.

- California Health Sciences University has evacuation and/or sheltering plans that are described within the Emergency Action Plan, Evacuation Plan, and Posted Signage. If there is immediate danger, call for emergency assistance by dialing 911, and then notify the Director of Security or their designee.

In the event of an emergency, including a Workplace Violence Emergency, contact the following:
<table>
<thead>
<tr>
<th>Responsible Persons</th>
<th>Job Title/Position</th>
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<td>Director of Security</td>
<td>Responsible for emergency response, hazard identification, and coordination with other employers; Matthew conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.</td>
<td>559-701-2131</td>
<td><a href="mailto:mbasgall@chsu.edu">mbasgall@chsu.edu</a></td>
</tr>
</tbody>
</table>

**WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION**

The following policies and procedures are established and required to be conducted by California Health Sciences University to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.

**Periodic Inspections**

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence.

Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the following designated personnel in the following areas of the workplace:

<table>
<thead>
<tr>
<th>Specific Person Name/Job Title</th>
<th>Area/Department/Specific location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Matthew Basgall, Director of Security</td>
<td>2500 Alluvial Ave</td>
</tr>
<tr>
<td>Matthew Basgall, Director of Security</td>
<td>120 N. Clovis Ave</td>
</tr>
</tbody>
</table>

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
Employees can report incidents to their supervisor, the Director of Security, Human Resources, or through an anonymous online form.

a. Director of Security: 559-701-2131

b. Vice President of Human Resources: 559-282-8747

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. The Director of Security will implement the following effective procedures to correct workplace violence hazards that are identified:

• If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection. Those employees necessary to correct the hazardous condition will be determined by the Director of Security and as outlined in the University’s Emergency Action Plan.

• The Director of Security will document and date on the appropriate forms all corrective actions taken.

• Corrective measures for workplace violence hazards will be specific to a given work area.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the Director of Security or their designee will implement the following post-incident procedures:

• Visit the scene of an incident as soon as safe and practicable.

• Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.

• Review security footage of existing security cameras if applicable.

• Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.

• Determine the cause of the incident.

• Take corrective action to prevent similar incidents from occurring.
• Record the findings and ensuring corrective actions are taken.

• Obtain any reports completed by law enforcement.

• The violent incident log will be used for every workplace violence incident and will include all relevant information as required in the Violent Incident Log.
  
  o The date, time, and location of the incident.
  
  o The workplace violence type or types involved in the incident.
  
  o A detailed description of the incident.
  
  o 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 other perpetrator.
  
  o 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.
  
  o A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
  
  o The type of incident, including, but not limited to, whether it involved any of the following:
    
    ▪ Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
    
    ▪ Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
    
    ▪ Threat of physical force or threat of the use of a weapon or other object.
    
    ▪ Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
    
    ▪ Animal attack.
• Other.
  o Consequences of the incident, including, but not limited to:
    ▪ Whether security or law enforcement was contacted and their response.
    ▪ Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
    ▪ Information about the person completing the log, including their name, job title, and the date completed.

• Reviewing all previous incidents.

The University will provide information on support and resources, such as counseling services, to the affected employees.

The University will ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the 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.

**TRAINING AND INSTRUCTION**

All employees, including administration and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

• When the WVPP is first established.

• Annually to ensure all employees understand and comply with the plan.

• 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.

The University will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

• The employer’s WVPP, how to obtain a copy of the employer’s plan at no cost, and how to
participate in development and implementation of the employer’s plan.

- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.

- Workplace violence hazards specific to the employees’ jobs, the corrective measures the University has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.

- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.

- Opportunities the University has for interactive questions and answers with a person knowledgeable about the University plan.

- Strategies to avoid/prevent workplace violence and physical harm, such as:
  - How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
  - Ways to defuse hostile or threatening situations.

- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.

- Employee routes of escape.

- Emergency medical care provided in the event of any violent act upon an employee.

- Post-event trauma counseling for employees desiring such assistance.

**EMPLOYEE ACCESS TO THE WRITTEN WVPP**

The University ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by posting on the website.

**RECORDKEEPING**

The University will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.

- Create and maintain training records for a minimum of one (1) year and include the
following:

- Training dates.
- Contents or a summary of the training sessions.
- Names and qualifications of persons conducting the training.
- Names and job titles of all persons attending the training sessions.

- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.
  - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.

- 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), shall be made available to Cal/OSHA upon request for examination and copying.

**EMPLOYEE ACCESS TO RECORDS**

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request:

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

**REVIEW AND REVISION OF THE WVPP**

The California Health Sciences University WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan’s
effectiveness:

- Review of the WVPP should include, but is not limited to:
  - Review of incident investigations and the violent incident log.
  - Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).

Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees.

EMPLOYER REPORTING RESPONSIBILITIES

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, California Health Sciences University, LLC will immediately report to Cal/OSHA any serious injury or illness (as defined by CCR, Title 8, Section 330(h)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

[“I, [Name], [Job Title] of [Employer], hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to promoting a culture of safety and violence prevention in our workplace and believe that these policies and procedures will help us achieve that goal.”]

[Name and title of person authorizing this WVPP]

[Signature of person authorizing this WVPP]

[Date of Signature]
Violent Incident Log

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:
- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:
- Names
- Addresses – physical and electronic
- Telephone numbers
- Social security number

[Enter the date the incident occurred (Day, Month, Year)]

[Enter the time (or approximate time) that the incident occurred] a.m./p.m.

<table>
<thead>
<tr>
<th>Location(s) of Incident</th>
<th>Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4))</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Enter location(s) where the incident occurred]</td>
<td>[Enter the workplace violence type(s)]</td>
</tr>
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Check which of the following describes the type(s) of incident, and explain in detail:

**Note:** It’s important to understand that “Workplace Violence Type” and “Type of Incident” have separate requirements. For this part of the log, “Type of Incident” specifically refers to the nature or characteristics of the incident being logged. It does not refer to the type of workplace violence.

- Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair
pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.

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

Explain: [Provide a detailed description of the incident and any additional information on the violence incident type and what it included. Continue on separate sheet of paper if necessary.]

Workplace violence committed by: [For confidentiality, only include the 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 other perpetrator.]

Circumstances at the time of the incident: [write/type what was happening 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.]

Where the incident occurred: [Where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.]
Consequences of the incident, including, but not limited to:

- Whether security or law enforcement was contacted and their response.
- Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.

[Include information on what the consequences of the incident were.]

- Were there any injuries? Yes or No. Please explain:

[Indicate here if there were any injuries, if so, provide description of the injuries]

- Were emergency medical responders other than law enforcement contacted, such as a Fire Department, Paramedics, On-site First-aid certified personnel? Yes or No. If yes, explain below:
Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.

A copy of this violent incident log needs to be provided to the employer. Indicate when it was provided and to whom.

This violent incident log was completed by:

[Name of person completing this log], [Job Title of person completing this log], [Date this log was completed]

[Signature of person completing this log]  [Date of completion]