

WORKPLACE VIOLENCE PREVENTION PROGRAM

WVPP SB 553

University of San Francisco

POLICY

As a part of USF's [Workplace Violence Prevention Policy](#), the University of San Francisco ("University") is committed to promoting and maintaining a safe and secure workplace for its employees. Acts of violence, threats of violence, or physical intimidation will not be tolerated. If such conduct occurs, it should be promptly reported to Public Safety. The University will take appropriate action in response to reports of such conduct. Employees found to have violated this policy will be subject to disciplinary action, which may include immediate dismissal consistent with University policies and procedures. In addition, the University may assist in pursuing civil penalties, criminal penalties, or other appropriate action against the offender.

Employees who believe that they are victims of threatening or violent conduct in the workplace, who observe such behavior, or who believe that a credible threat of such behavior exists, should immediately report the conduct to Public Safety. Those who make such reports will be protected from retaliation.

Purpose

The University of San Francisco's 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. The Plan describes procedures to reduce workplace violence risks by encouraging reporting, identifying hazards, providing training, fostering communication, involving employees, and ensuring effective incident responses.

Date of Last Review: June 24, 2024

Date of Last Revision(s): June 24, 2024

DEFINITIONS

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

Employee – includes but not limited to faculty, staff, librarians and student employees.

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, including 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 a recipient of a service provided by the university

Type 3 violence - Workplace violence against an employee by a present or former employee.

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, Diane Sweeney, Director - Benefits has the authority and responsibility for implementing the provisions of this plan for the University of San Francisco. If there are multiple persons responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Diane Sweeney	Director, Benefits	Approves the final plan and any major changes. Ensures access of the WVPP to the community on the USF website. Informs Public Safety of all threats or acts of violence reported to Human Resources, advises Public Safety regarding concerns about violent and potentially violent employees, applies appropriate administrative and disciplinary action to employees who make a threat of violence or commit an act of violence against a member of the campus community, and may assist with investigations. In consultation with the Public Safety team, reviews & updates WVPP online training materials as needed. HR provides training and manages training records.	(415) 422-2440	sweeney@usfca.edu
Greg Yee	Director of Campus Resilience	Identifies workplace violence related hazards. Maintains the Workplace Violent Incident Log and ensures compliance. Reviews training content with HR as needed but at least annually.		gbyee@usfca.edu
Daniel Lawson	Senior Director, Public Safety	Responsible for receiving WVPP reports, coordinates emergency response and investigation of incidents; investigates workplace violence related hazards, conducts safety inspections and communicates with other employees about the plan.	415-422-4222	lawson@usfca.edu
Melissa Diaz	Director, Risk Management	Directs discussion on safety, security, and potential workplace violence hazards with the Health and Safety Committee. Ensures that the Committee agenda includes	415-422-5899	mddiaz2@usfca.edu

		discussion of safety, security issues, and potential workplace violence hazards. Ensures that all employees' concerns and feedback are forwarded to the appropriate departments.		
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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 INVOLVEMENT

University of San Francisco promulgates the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan. It is the responsibility of every member of the campus community to take any act of violence or threat of violence seriously and to immediately report workplace violence or threats of violence to the USF Public Safety department at (415) 422-2911.

- The University will work with and allow employees and authorized employee representatives through the Health and Safety Committee to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence.

The Health & Safety Committee will have regular meetings 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 suggesting and reviewing training programs, and their suggestions are incorporated into the training materials.

- Reporting workplace violence incidents.
- The University 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.
- 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

This plan is meant to foster a secure work environment and promote respectful behavior and rules that prevent threats and physical altercations. To achieve this goal, employees must 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.

To ensure compliance with this plan, there will be training on the provisions of this Workplace Violence Prevention Plan (WVPP) for all employees. This training includes initial training, annual training, and retraining when the plan updated or when an employee performance warrants it. Employees who fail to comply with this plan will be disciplined following existing University policies and may result in disciplinary action up to and

including termination. The University will continue to adhere to the provisions of all applicable collective bargaining agreements with respect to disciplinary matters.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between the University and employees and contractors 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 management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation provides an overview of the University WVPP and ensures new hires understand where to access the plan, policies, and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled Health & Safety Committee meetings that address safety, 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.
- Information about how employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
- It is the responsibility of every member of the campus community to take any act of violence or threat of violence seriously and to immediately report workplace violence or threats of violence to the USF Public Safety department at (415) 422-2911.
- Employees can anonymously report a violent incident, threat, of other violence concerns by contacting the Whistleblower hotline at (800) 316-4315.
- Additional resources to report non-immediate emergencies are Human Resources, the USF Whistleblower hotline (800) 316-4315 or your supervisor. Human Resources and all supervisors will report all incidents to Public Safety.

COORDINATION WITH OTHER EMPLOYERS

The University of San Francisco will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees will be trained in workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- As a multi-employer worksite, the University will work with other entities with employees on university campuses (“contractor”) [see attached list] to ensure that the contractor trains its employees. If its employees experience a workplace violence incident, they will report such violence to the Contractor and the University. The University will record the information in a violent incident log and shall also provide a copy of that log to the Contractor.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

University of San Francisco will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to Public Safety (415) 422-2911.
- Employees can report incidents to their supervisor, Human Resources (415) 422-6707 or through the Whistleblower hotline (800-316-4315).

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Any supervisor, or employee who retaliates against a coworker for reporting an incident could be disciplined or terminated.

In order to help provide a safe environment and protect individuals from risks to their safety, USF must be informed about individuals ordered by the courts to keep their distance from USF-related individuals or property. USF understands the sensitivity of this information and will treat it with appropriate discretion and confidentiality.

Any individual who seeks or has obtained a restraining order or protective order involving USF as a “protected location”, whether named explicitly or not (e.g. work, school, etc.), must provide the following documentation of the matter to Public Safety:

- ✓ a copy of the petition and declarations used to seek the protective or restraining order,
- ✓ a copy of any temporary protective or restraining order which is granted and its proof of service, and
- ✓ a copy of any permanent order and its proof of service.

For more information about obtaining a restraining or protective order, contact Public Safety at (415) 422-4201.

EMERGENCY RESPONSE PROCEDURES

University of San Francisco has in place the following specific measures to handle actual or potential workplace violence emergencies:

- The Office of Campus Resilience is responsible for assisting and coordinating the University’s overall incident management planning and preparation. This includes developing, maintaining, and facilitating implementation of the University’s emergency operations plan; developing and conducting exercises to test plans and procedures; facilitating emergency notification communication within the USF community; conducting outreach education on university preparedness for students, faculty, and staff; and engaging external partners to improve overall university preparedness.
- Emergency Blue Light Phones. Emergency blue light phones are located on the Hilltop Campus. Once activated, a large blue strobe light flashes from the top of the phone tower and the Public Safety Dispatcher is notified immediately. There are a number of non-blue light emergency phones on campus that are clearly marked as emergency call boxes. If you need assistance, see something that is suspicious, or see someone else who needs assistance, you could activate a blue light phone and speak directly with the Public Safety Dispatcher or call (415) 422-2911 from your mobile phone.
- Evacuation. In the event of an immediate, life-threatening emergency during which campus must be evacuated, the Department of Public Safety or Emergency Operations Center Personnel, in collaboration with San Francisco emergency services, will coordinate the evacuation route with civil authorities as needed. Once determined, emergency personnel will disseminate information about the evacuation location and route. Campus and community communication systems will be used to provide information about this type of evacuation.
- Shelter in Place. If an incident occurs on campus and it is determined that the area outside of buildings poses a threat to health and/or safety, the determination may be made to call for a “shelter-in-place.” This is done when it is safer to remain inside because leaving the building may expose you to danger. A

notification to shelter-in-place will come from the Department of Public Safety using the university's emergency notification system.

If you are inside when a shelter-in-place notification is issued, stay where you are. If you are outdoors, proceed to the closest campus building. Once inside, it is important to move to a location suitable for sheltering. The university will send out a notification once the shelter-in-place has been lifted.

- Public Safety officers receive American Red Cross First Aid, CPR, and AED training every two years.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

Hazard identification and evaluation is a critical part of establishing a safe working environment. Inspections by Public Safety will be conducted when this plan is first established, after each workplace violence incident, and whenever there is a new or previously unrecognized hazard. The University will promptly review all reports of potential hazards. Employees must report all threats or acts of workplace violence. It is the responsibility of every member of the campus community to take any act of violence or threat of violence seriously and to immediately report workplace violence or threats of violence to the USF Public Safety department at (415) 422-2911. Additional resources to report non immediate emergencies are Human Resources, the USF Whistleblower hotline or your supervisor.

Periodic Inspections

Periodic inspections of workplace violence hazards will be conducted by Public Safety to identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Reinstate yearly walkabouts with Facilities, General Counsel, Public Safety, Risk Managements, etc.

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness for criminal activities.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including our policy prohibiting employees from confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and function of emergency buttons, alarms, and blue light emergency phones.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, and physical barriers.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms or panic buttons.
- 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.

WORKPLACE VIOLENCE HAZARD CORRECTION

Once workplace violence hazards have been identified they will be evaluated and corrected in a timely manner. University of San Francisco 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.
- All corrective actions taken will be documented and dated on the appropriate forms.
- Corrective measures for workplace violence hazards will be specific to a given work area.
 - Make the workplace unattractive to criminal activities by:
 - Improving lighting around and at the workplace.
 - Utilizing surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
 - Public Safety Officers and, as needed, contracted security guards, to patrol the workplace interior and perimeter.
 - Security surveillance cameras in and around the workplace.
 - Provide workplace violence systems, such as door locks, physical barriers, emergency alarms and restraint systems by:
 - Ensuring the adequacy of workplace violence systems
 - Posting emergency telephone numbers for law enforcement, fire, and medical services
 - Controlling, 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.
 - Controlling, access to, and freedom of movement within the workplace by employees who are involved in a workplace violence complaint or investigation.
 - Installing effective systems to warn others of a violence danger or to summon assistance,
 - Provide employee training/re-training(refreshers) on the WVPP, which could include but is not limited to the following:
 - Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
 - Ensuring that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
 - Improving how well our establishment's management and employees communicate with each other.
 - Procedures for reporting suspicious persons, activities, and packages. These procedures can be found in critical incident prep and response material located on DPS website.
 - Provide/review employee, supervisor, and management training on emergency action procedures.
 - Ensure adequate employee escape routes.

- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
- Establish a policy for prohibited practices as a
 - a. [Firearms/weapons policy](#)
 - b. [Anti-harassment policy](#)
 - c. [Title IX](#)

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, a member of the Public Safety team will implement the following post-incident procedures:

- Visit the scene of an incident as soon as it is 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 information, such as:
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A detailed description of the incident.
 - A classification of who committed the violence, including whether the perpetrator was a student, 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.
 - 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.
 - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - 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.
- 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.
 - Employees are encouraged to seek confidential counseling assistance through the University's **Employee Assistance Program** at 1-800-344-4222 (company code: usf). Student employees may seek assistance through **Counseling and Psychological Services (CAPS)** at (415) 422-6352.

Ensure that no personal identifying information is recorded or documented in the written workplace violence 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 managers and supervisors, will have training and instruction on 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.
- Upon hire.
- 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.

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

- How to obtain a copy of the employer's WVPP 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 University of San Francisco 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 University of San Francisco has for interactive questions and answers with a person knowledgeable about the University of San Francisco 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.
- Employees are encouraged to seek confidential counseling assistance through the University's [Employee Assistance Program](#) at [Concern](#) or 1-800-344-4222 (company code: usf).

EMPLOYEE ACCESS TO THE WRITTEN WVPP AND RECORDS

University of San Francisco 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.

- We will provide unobstructed access through the website, which allows an employee to review, print, and email the current version of the written WVPP.

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.

RECORDKEEPING

University of San Francisco 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.

REVIEW AND REVISION OF THE WVPP

The University of San Francisco 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 University of San Francisco's 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. [These revisions could involve changes to procedures, updates to contact information, and additions to training materials.]

EMPLOYER REPORTING RESPONSIBILITIES

As required by California Code of Regulations (CCR), Title 8, Section 342(a), Reporting Work-Connected Fatalities and Serious Injuries, University of San Francisco 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, Diane Nelson, Associate Vice President of Human Resources of the University of San Francisco, 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 ensuring the safety and well-being of our employees and believe that these policies and procedures will help us achieve that goal.



X _____
 Diane Nelson
 Associate Vice President, Human Resources

June 20, 2024