



Workplace Violence Prevention Plan (WVPP)

SB553 Compliant

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Introduction

SDSU Research Foundation (SDSURF) aims to provide a working environment that minimizes the potential for workplace violence and other safety and security risks. Violence in the workplace poses a significant threat to the safety and wellbeing of our employees and the public. It is the responsibility of all employees to help minimize workplace violence. This Workplace Violence Prevention Plan (WVPP) establishes procedures to minimize the threat of violence in the workplace and provides guidelines for responding promptly and effectively to workplace violence events.

Scope

The WVPP applies to all members of the SDSURF community when engaged in SDSURF academic, business, or co-curricular programs and activities, whether on or off campus. The Plan applies to all SDSURF employees, regardless of rank or work status of full time, part-time, temporary or seasonal. The WVPP does not apply to SDSURF employees when telecommuting from a location of the employee's choice, not under the control of SDSURF (fully Remote employee). University auxiliary organizations are responsible for applying similar practices to their respective employees, programs, and activities.

Note: The following are notable exemptions to this Plan:

- Places of employment where there are fewer than 10 employees working at any given time and that are not accessible to the public
- Employees teleworking from a location of the employee's choice, which is not under SDSURF's control

Purpose

The purpose of this Plan is to:

- Identify the names and job titles of the persons responsible for the implementation and maintenance of the Workplace Violence Prevention Program (WVPP).
- Highlight how employees can report violent incidents, threats, or other related workplace violence concerns, and how to respond appropriately to reports.
- Reinforce against unlawful retaliation for reporting, in good faith, violent incidents, threats, or other workplace related 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 content and frequency of training.
- Outline procedures to identify and evaluate workplace violence hazards and prevention methods.
- Communicate post-incident responses and investigation processes.

Authority

California Labor Code Sections 6401.7 and 6401.9.

Definitions

The following definitions are used exclusively in this document to provide clarity and consistency and may or may not be the same definition used for other applications or in standard generalized definitions.

Active Shooter is a person who brings and discharges firearm weapons at a workplace with the intent to cause great bodily harm, or who intends to threaten, coerce, or intimidate with great bodily harm those who are in the immediate vicinity of the threatening person.

Emergency is an unanticipated circumstance that can be life threatening or pose a risk of significant injury/harm to an individual.

Engineering control is an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between an individual and the hazard.

Fully Remote Worker refers to an employee who performs all job tasks from a personally selected location and does not report to the employer's work site for any portion of the work activities.

Log is the Violent Incident Log required by Labor Code Section 6401.9.

Physical Threat refers to the use of any object as a weapon, whether concealed or apparent, against a targeted person, or the intent to use such an object for the purpose of coercing, intimidating, or threatening another person where the targeted person believes personal harm is imminent and severe.

Relative refers to a person who does not work for SDSURF and is either a person currently or formerly related by blood, marriage, adoption, or other familial type relationship to one or more SDSURF current or past employees.

Threat of violence means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavior or physical conduct that conveys an intent, or that is reasonably perceived to convey an intent to cause imminent physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose other than a nefarious act.

Work Practice Control refers to procedures and rules which are used to effectively reduce workplace violence hazards.

Workplace Violence refers to any act of violence or threat of violence that occurs in a place of employment. It includes, regardless of whether an employee sustains an injury, the threat or use of physical force against an employee that results in, or is likely to result in, injury, trauma, or stress, as well as incidents involving a threat or use of a firearm or other dangerous weapon.

There are four common types of workplace violence:

- **Type 1:** Workplace violence committed by a person who has no legitimate business at the work site, including violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime
- **Type 2:** Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors
- **Type 3:** Workplace violence against an employee by a present or former employee, supervisor, or manager
- **Type 4:** 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.

Section One: The Basic Tenets of the Plan

SDSURF is committed to employee safety and health. SDSURF will not tolerate any form of violence in the workplace and will make every effort to prevent violent incidents from occurring. In support of this, SDSURF has implemented a Workplace Violence Prevention Plan (WVPP) in alignment with California SB553 and Labor Code §6401.9. Part of this Plan includes SDSURF's commitment to provide adequate resources, authority, and budgetary allocations to responsible parties to ensure that goals and responsibilities relating to this Plan are achieved in compliance with regulatory requirements, including but not limited to, the assurance of protecting employees' lives to the greatest extent possible.

Only the following organizations and workers are exempt from SB 553 compliance requirements:

- Law Enforcement
- Remote workers
- Employers with less than 10 employees
- Some healthcare facilities

Types of Threats and Examples

As defined above, there are four (4) situational categories that create possible threat and risk for the employer and employees under this Workplace Violence Prevention Plan. The following provides examples to ensure clarity of each category. The examples do not represent all such incidents that could fall under each category.

- **Type 1 Threat:** from a non-employee with no business interest

Example: A person seeks out the employer randomly with the intent to rob the establishment of cash or merchandise.

- **Type 2 Threat:** from a customer, client, service recipient, or is someone associated with the business of the employer

Example: An angry, dissatisfied customer seeks out the employer's salesperson in revenge for not being allowed to return merchandise.

- **Type 3 Threat:** from an employee of the employer

Example: Two employees' physical altercation escalates out of control.

- **Type 4 Threat:** from a relative (former or current) of an employee

Example: A person seeks revenge on a former spouse who works for the employer

No employee shall engage in verbal threats that have the potential to escalate into physical actions or in physical altercations which create a security hazard and cause physical and/or emotional threats against the health and safety of others in the workplace.

Section Two: Responsibilities

The WVPP Plan Administrator (PA) is the person who has the authority and responsibility for implementing the provisions of this Plan for SDSURF, though several individuals are part of the WVPP Planning Group (PG), with each playing an important role in the execution, maintenance, communication and training of this Plan. The list of responsible parties below is provided in the event questions or situations arise that require immediate attention.

The WVPP Planning Group (PG) has been established to:

1. Assess SDSURF’s vulnerability to workplace violence; and
2. Recommend steps to reduce risk; and
3. Identify gaps in safety/security and steps to reduce risk; and
4. Reach consensus on preventive actions to be taken; and
5. Ensure that annual training is timely completed for all employees; and
6. Prepare all employees to respond to acts of violence based on the training received; and
7. Assess the effectiveness of SDSURF’s overall Workplace Violence Prevention Plan; and
8. Audit the Plan for compliance.

WVPP Planning Group

Responsibilities

Responsible Person	Job Title/Position	WVPP Responsibilities	Contact
Jaroslav Zeman	Enterprise Risk Management Officer	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Identification and evaluation of workplace violence hazards • Post-incident response and investigations in coordination with Human Resources • Record keeping of non-confidential data <ul style="list-style-type: none"> ○ Maintaining violence incident log for each incident 	619-594-3550 jzeman@sdsu.edu
Melinda Swearingen	Director of Human Resources	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Identification of and evaluation of workplace violence hazards • Post-incident response and investigations • Record keeping of confidential data <ul style="list-style-type: none"> ○ Create and maintain records of workplace violence hazard 	619-594-1087 mwearingen@sdsu.edu

		<ul style="list-style-type: none"> identification, evaluation, and correction <ul style="list-style-type: none"> ○ Maintain records of workplace violence incident investigations 	
Gregory Darbonne	Sr. Training and Compliance HRBP	<ul style="list-style-type: none"> • Training and development • Create and maintain training records 	619-594-1087 gdarbonne@sdsu.edu
Eric Elson	Director of Facilities Planning & Management	<ul style="list-style-type: none"> • Plan review • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-597-0961 eelson@sdsu.edu
Teresa Loren	Controller/Director of Financial Services	<ul style="list-style-type: none"> • Plan review • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-594-3141 tloren@sdsu.edu
Steve Torok	Director of Sponsored Research Development	<ul style="list-style-type: none"> • Plan review • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-594-4478 steve.torok@sdsu.edu
Cody Lee	Communications Officer	<ul style="list-style-type: none"> • Communications regarding workplace violence 	619-594-5410 celee@sdsu.edu
Renee Lechner	Director of Sponsored Research Administration	<ul style="list-style-type: none"> • Plan review • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-594-4349 rlechner@sdsu.edu
Sandra Nordahl	Director of Contracting and Compliance	<ul style="list-style-type: none"> • Plan review • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-594-4172 snordahl@sdsu.edu
Rachel Raynoha	Chief Information Systems Officer	<ul style="list-style-type: none"> • Plan review • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-594-1066 Rraynoha@sdsu.edu
Joe Wolfman	SDSU Global Campus Associate Dean of Finance and Operations	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	619-594-7078 jwolfman@sdsu.edu
Lois Hoyt	KPBS	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence 	619-594-1515 lhoyt@kpbs.org

		<ul style="list-style-type: none"> • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	
Norliza Tayag-Cruz	WIC Director	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	858-505-3070 ncruz@sdsuwic.org
Tricia Santos	WIC Assistant Director	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	858-505-3063 tsantos@sdsuwic.org
Paul Knipp	WIC Associate Director	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	858-505-3061 pknipp@sdsuwic.com
Melanie Barker	DUI	<ul style="list-style-type: none"> • Plan review and update • Reporting workplace violence • Responding to workplace violence • Emergency response procedures • Identification of and evaluation of workplace violence hazards 	858-467-6810 x123 mbarker@sdsu.edu

Senior Management Team

Michèle G. Goetz	Associate Vice President and CEO	mgoetz@sdsu.edu
Leslie R. Levinson	Chief Financial Officer	llevinson@sdsu.edu
Rachel Raynoha	Chief Information Systems Officer	rraynoha@sdsu.edu
Deb Naylor	Chief Human Resources Officer	dnaylor@sdsu.edu

Manager Responsibilities

On a regular basis, managers and supervisors will:

- Inform employees, including new hires, of SDSURF's Workplace Violence Prevention Plan.
- Evaluate the performance of all employees in compliance with SDSURF's workplace security measures.
- Recognize employees who perform work practices which promote security in the workplace.
- Assist in providing training and/or counseling to employees who need to improve work practices designed to ensure workplace security.
- Ensure that employees know how to identify and report any and all workplace violence-related concerns or hazards.

- Communicate known concerns to the SDSURF WVPP Planning Group as soon as they become known.
- Attend training as required; attend optional training to raise self-awareness.
- Ensure that all safety and health protocols, plans, policies and procedures involving workplace safety and security are clearly communicated, understood, and followed by all covered employees within the work group.
- Enforce the rules fairly and uniformly.
- Hold employees and themselves accountable for protecting workers to the extent reasonably possible while focusing on minimizing risk of workplace violence as much as possible and practical.

To the extent possible, SDSURF's Plan ensures that all employees, including management, adhere to work practices designed to make SDSURF more secure and safe, and do not engage in verbal threats that have the potential to escalate into physical actions or physical altercation which create workplace security hazards and physical and/or emotional health concerns. It is important that all adhere to the directives, policies, and procedures outlined in this Plan and other related safety programs, in a collective effort to support and maintain a safe and secure working environment for all.

Employee Responsibilities:

- Adhere to the requirements in the Plan.
- Attend training.
- Participate in feedback to improve the Plan.
- Report any suspect activity: "See something, say something."
- Cooperate with investigators.
- Shield oneself and others during the crisis or threatening incident, as applicable.

Section Three: Compliance

Employee Compliance

All SDSURF employees, including managers and Principal Investigators, are expected to adhere to this Plan and are responsible for ensuring they have read this Plan and act in compliance with it.

To ensure that employees comply with the rules and safe work practices included in this Plan, we will take the following steps at a minimum:

- Inform employees of the provisions of this Plan.
- Educate employees about what does (and does not) constitute workplace violence, as well as the workplace hazards that are relevant to their specific roles.
- Establish accessible channels for employees to report workplace hazards and violence, including when needed.
- Provide training to all employees when the Plan is created, and as new hazards are identified.
- Conduct post-incident investigations and implement corrective measures as needed.
- Discipline employees who fail to comply with the WVPP.

All employees are required to adhere to this Plan and will be held accountable for using safe work practices at all times when relating to duties performed at the employee's work site:

- All directives of this Plan
- Policies and procedures of this Plan
- Reporting to management any known workplace incidents of violence
- Protecting oneself from immediate threat or harm
- Assisting injured workers
- Working with colleagues to help maintain or improve a safe and secure work environment

Managers, supervisors, and employees are to comply with work practices that are designed to make the workplace more secure and agree to not engage in threats or physical actions that create a security hazard for others in the workplace

Vendors with employees who regularly work on or off campus must ensure that they are in compliance with California Labor Code Sections 6401.7 and 6401.9 and have provided workplace violence prevention training to their employees that includes information on how to report concerns or incidents to SDSURF. Vendors will immediately report to SDSURF any threats or incidents reported to them by their employees or affiliates that may impact SDSURF.

Section Four: Participation, Communication, and Training

Participation

While fully remote workers are exempt from the WVPP, all other employees, including hybrid and in-person workers, regardless of rank or status, are uniformly required to adhere to SDSURF's Workplace Violence Prevention Plan and are expected to complete the regulatory annual training and participate as required in activities associated with this WVPP, whether these require in-person attendance or through technological means.

Employee Involvement

In compliance with Plan requirements, employees and authorized employee representatives are encouraged to contribute to the development, implementation, and evolution of the WVPP. Collaboration and contribution help ensure conscientious objectives are reached in the prevention and reduction of threat risks. SDSURF will have an employee Feedback form posted on our website for our employees to report any potential Workplace Violence hazards.

Employees will contribute by:

- Identifying potential threats, concerns, hazards, and corrective actions.
- Providing feedback in the development and implementation of applicable training.
- Attending training and demonstrating compliance with the Plan.
- Reporting to management potential threats, concerns, hazards, and needed corrective measures and/or the WVPP Planning Group.

Communication

Managers and supervisors will maintain an open, two-way communications system on all workplace safety, health, and security matters. SDSURF has a communication system designed to encourage a continuous flow of information, questions and answers regarding safety, health and security between administration/management and employees without fear of reprisal and in a form that is readily understood.

SDSURF's communication system consists of the following items, and may vary by business group:

- New employee onboarding process that covers workplace security policies, procedures, reporting, and work practices
- Periodic review of SDSURF's Workplace Violence Prevention Plan with all personnel
- Training programs designed to address specific aspects of workplace security unique to SDSURF
- Regularly scheduled safety meetings with all personnel that include workplace security
- Discussions on how to mitigate workplace violence
- Through the online portal system, methods to ensure that all employees, including managers and supervisors, are aware, understand, and agree to adhere to workplace security policies
- Postings distributed throughout various SDSURF channels that include what constitutes workplace violence, the protocols for protecting oneself, and steps for reporting workplace violence threats or incidents
- A system for employees to inform management about workplace security hazards or threats of violence that includes more than one channel for reporting incidents and obtaining action
- Procedures for protecting employees from retaliation when reporting threats of violence or related incidents
- Compliance with the State of California's Workplace Violence Prevention Plan requirements and agreement to communicate with, and instruct employees, orally and in writing, about general safe work practices with respect to workplace security
- Ensure that employees whose native language is not English have the opportunity to be informed and advised of their rights and responsibilities regarding this Plan

Managers are responsible for communicating with all employees about workplace violence in a form readily understandable by all employees. All employees are encouraged to inform their managers about workplace hazards and may do so without fear of reprisal. Our communications efforts include the following:

- New employee orientation, including a discussion of workplace hazards and reporting channels
- Regularly scheduled training
- A system through which employees can inform management about workplace hazards, violent incidents, threats, and other workplace violence concerns, which include anonymous reporting channels

Training

In accordance with WVPP regulatory requirements, and depending on the employee's assigned role, the following training for the Workplace Violence Protection Plan, includes, but may not be limited to the following:

- How to identify and evaluate workplace Violence Hazards*
- Define terms and provide examples of workplace violence*
- Knowledge of how to access the most up-to-date version of this Plan*
- Knowledge of how employees can participate in the development and implementation of this Plan*

- Key definitions*
- How to report workplace violence incidents or concerns*
- Workplace violence hazards specific to an employee's role
- How to seek assistance to prevent or respond to violence*
- Strategies to avoid physical harm*
- Communicate with employees about workplace violence
- Respond to and report workplace violence incidents
- Correct unsafe conditions*
- Respond to and investigate workplace violence incidents
- Review the Plan annually, after an incident, and when a deficiency in the Plan or compliance is observed.

**Indicates the general training all employees receive*

Any such training will be conducted through CSU Learn training courses.

Training and instruction about this Plan are provided:

- When this Plan is first established.
- To all employees annually.
- Whenever new or previously unrecognized workplace violence hazards have been identified; or
- When changes are made to this Plan.

To the extent that training is provided when a new or previously unrecognized workplace violence hazard has been identified — or when changes are made to this Plan — such training will only cover the new hazards and/or changes to this Plan.

Section Five: Evaluations, Inspections, and Administration

Hazard Assessment

The Workplace Violence Prevention Group or its delegated personnel periodically performs:

- Workplace hazard assessments for workplace security improvements
- Review of the status of the Plan and documents shortfalls and gaps for improvement
- Reports about risk assessments and preventative measures
- Recordkeeping of documented and/or reported incidents
- Workplace security inspections
- Annual workplace employee surveys to engage employees and ensure employee perceptions of Safety and security are considered for the Plan's improvements
- Assessments that identify workplace violence and security issues
- Recommendations to management and employees on needed changes to the Plan

Workplace Security Inspections

Periodic inspections are conducted by the following observer(s) to identify and evaluate workplace security hazards and threats of workplace violence in the following areas of SDSURF's workplace(s):

Observer Area

Periodic inspections are performed according to the following schedule:

1. When SDSURF initially established SDSURF's Workplace Violence Prevention Plan; and
2. When new, previously unidentified security hazards are recognized; and
3. When occupational injuries or threats of injury occur; and
4. Whenever workplace security conditions warrant an inspection

Periodic inspections for security hazards consist of identification and evaluation of workplace security hazards and changes in employee work practices. Supervisors and managers are required to inspect the work locations they are responsible for. These may require assessing risk where more than one type of workplace violence could apply. SDSURF performs inspections categorized by each workplace violence type and by using the methods specified below to identify and evaluate workplace security hazards. (see *Addendum 1 for inspections descriptions*).

Reporting Workplace Violence

Members of the SDSURF community who witness or perceive an act of violence or a threat of violence on or off campus may report that incident of workplace violence or other workplace violence concern using one or more of the following means.

- 9-1-1 (when safe to do so) if the situation warrants immediate attention.
- [Online Incident Reporting Form](#) (preferred method for reporting non-urgent incidents of violence and threats)
- Their immediate Supervisor or department Chair/Supervisor*
- Management team, Risk Management (sdsurfriskmanagement@sdsu.edu or 619-594-4076), and Human Resources (sdsurfhr@sdsu.edu or 619-594-4139)

*Offices and supervisors who receive reports directly are advised to submit an online report to assist with record keeping.

***Anonymous Reporting: Individuals will have the ability to anonymously report incidents of workplace violence through the online reporting form. SDSURF cautions that anonymous reports that do not include significant detail may be difficult to investigate, but SDSURF will investigate such reports to the fullest extent possible.*

SDSURF strictly prohibits and does not tolerate any form of unlawful retaliation for engaging in any protected activity, including good faith reporting of incidents of workplace violence, or filing, testifying, assisting, or participating in any manner in any related investigation, proceeding, or hearing.

- Prohibited retaliation includes, but is not limited to: demotion, suspension, reduction in pay, denial of a merit salary increase, failure to hire or consider for hire, refusing to promote or consider for promotion; harassing another employee for reporting a violation, denying employment opportunities because of reporting a violation or for cooperating in an investigation, changing someone's work

assignments, treating people differently such as denying an accommodation, not talking to an employee when otherwise required by job duties, or otherwise excluding the employee from job-related activities because of engagement in activities protected under this Plan.

Communications Regarding Workplace Violence

Managers are responsible for communicating with all employees about workplace violence in a form readily understandable by all employees. All employees are encouraged to inform their managers about workplace hazards and may do so without fear of reprisal.

Our communications efforts include the following:

- New employee orientation, including a discussion of workplace hazards and reporting channels
- Regularly scheduled training
- A system through which employees can inform management about workplace hazards, violent incidents, threats, and other workplace violence concerns, which includes anonymous reporting channels

Section Six: Incidents

Responding to Incidents of Workplace Violence

SDSURF is committed to maintaining a safe working environment and culture where safety is paramount, and where fostering a climate of trust and well-being is expected by all. Following any incident, SDSURF will conduct a thorough investigation, implement necessary security measures, offer necessary support services to those impacted, and take disciplinary action where required along the way. Our response procedures reflect our commitment to maintaining a workplace where safety is paramount, fostering a culture of trust and well-being for all.

In extreme cases, other important measures may be needed before employees are allowed to return to, or resume working, in their designated work areas. Employees will be notified by their management team (or from the Planning Group) if this is necessary as authorized, and what next steps need to be followed.

Law enforcement may need to interview selected employees who were witnesses to the incident. Helping expedite the investigation by speaking with law enforcement is encouraged by SDSURF personnel, but is not required, as it is a personal choice of the employee.

As needed, SDSURF may provide additional services on a case-by-case basis to employees who were exposed to traumatic events caused by a workplace violence incident. Services may include, but may not be limited to, mental health services and crisis therapies. (*see addendum 2 for Active Shooter information*)

Identification and Evaluation of Workplace Violence Hazards

SDSURF will proactively identify and evaluate workplace violence hazards to help ensure the ongoing safety and security of our employees. Our comprehensive approach involves:

- Regular risk assessments conducted by those listed in the Responsibilities section.

- Inspections that will be conducted when the Plan is first established, after each workplace violence incident, and whenever SDSURF is made aware of a new or previously unrecognized hazard.
- Open communication with employees is encouraged, providing an employee wo form for any employee to report concerns, observations, workplace violence hazards. Employees can choose to remain anonymous. This form will be posted on our website. (See Addendum 3).
- Workplace Violence Feedback Forms for employees to report any issues and concerns of Workplace Violence.

Workplace Violence Physical Hazard Correction

- SDSURF and Facilities Services will direct the evaluation and timely correction of identified workplace violence physical hazards.
- All corrective actions taken/engineering controls adopted will be documented, dated, and recorded.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s), we will work to remove all endangered employees from the area except those necessary to address the existing hazard. Employees who are required to address the hazard shall be provided with the necessary protection.
- Corrective measures and/or engineering controls for workplace violence physical hazards will be specific to a given work area, for example:
 - Improve lighting around and at the workplace.
 - Install and utilize 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.
 - Provide workplace security systems, such as door locks, swipe card access control based on authorized person and day/time, security windows, physical barriers, emergency alarms, and restraint systems.
 - Post emergency telephone numbers for law enforcement, fire, and medical services.
 - Install effective systems to warn others of a violence danger or to summon assistance, e.g., alarms or panic buttons.
- SDSURF will undertake corrective measures and/or engineering controls to correct physical hazards in a timely manner based on the severity of the hazard.
- Workplace Violence Unsafe Work Practice Hazard Identification, Evaluation and Correction will be done
- SDSURF will coordinate and conduct annual reviews of employment practices to mitigate and reduce the likelihood that such practice could underlie a threat or act of violence.
- Members of SDSURF may report unsafe work practices or other workplace violence concerns using the following means:
 - SDSURF management team
 - Risk Management: sdsurfriskmanagement@sdsu.edu or 619-594-4076
 - Human Resources: sdsurfhr@sdsu.edu or 619-594-4139

SDSURF will mitigate and/or reduce such practices in a timely manner based on the severity of the hazard.

Emergency Response

In the event of a workplace violence emergency, SDSURF will communicate through the following means in a manner readily understandable by all members of SDSURF.

- Send alerts to members of the SDSURF community through the SDSU Safe App and SDSU texting.
 - Emergency notification, and/or safety bulletin process.
- When information is available and appropriate, these alerts will:
 - Provide the presence, location, and nature of the workplace violence emergency.
 - Note evacuation or sheltering plans appropriate and feasible for the situation.
 - Inform recipients how to obtain assistance from the University Police Department (UPD) or other law enforcement agencies.

SDSURF has implemented the following emergency response procedures for dealing with active or potential workplace violence emergencies:

- Evacuation or sheltering plans to respond to actual or potential workplace violence emergencies.
 - https://foundation.sdsu.edu/pdf/facilities_emergency_response_manual.pdf
- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies.
 - https://foundation.sdsu.edu/pdf/facilities_emergency_response_manual.pdf
- Obtain help from staff, security personnel, or law enforcement.
 - Use a panic button (for areas and offices equipped with panic buttons).
 - Call 9-1-1.

Post-Incident Response and Investigations

Any workplace violence incident must be thoroughly investigated whether physical injury has occurred or not. Procedures for investigations shall include:

- Assessment of the incident scene as soon as possible
- Interviews of all parties involved including employees, security, patrons, and witnesses
- Reports from law enforcement
- Examining the location for factors associated with the incident
- Review of security footage
- Review of all previous incidents
- Determining the cause of the incident
- Taking corrective action to prevent the incident from recurring
- Recording the findings and taking corrective action
- Document in the violent incident log
- Occupational Safety and Health Administration (OSHA) logs
- Insurance records
- Employee Feedback Form
- Training records
- Grievances
- Other relevant records

Violent Incident Log:

The SDSURF Risk Management is primarily responsible for maintaining the Log, which will be used to record the details of the Incident . The log must 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
- Classification of the perpetrator (e.g., client, customer, friend, coworker, etc.)
- Classification of circumstances at the time of incident (e.g., working regular job duties, rushed, working during low staffing, isolated/alone, working in 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
- The type of incident:
 - Physical attack without a weapon (e.g. biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, spitting)
 - Attack with a weapon or other object
 - Threat of physical force or threat of the use of a weapon or other object
 - Sexual assault or threat (e.g. rape, attempted rape, physical display, or unwanted verbal or physical sexual contact)
 - Animal attack
 - Other

Please contact Risk Management for copies of any of these records by emailing sdsurfriskmanagement@sdsu.edu

Recordkeeping

SDSURF is required to:

- 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 a violent incident log for each workplace violence incident and maintain such records for at least 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.

Employee Access to Written WVPP

A copy of SDSURF's WVPP shall be kept in writing and made available and easily accessible to employees, authorized employee representatives, and representatives of Cal-OSHA at all times. This information may be requested by emailing sdsurfhr@sdsu.edu or sdsurfriskmanagement@sdsu.edu.

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
- Training records
- Violent incident logs

Plan Review and Update

This Plan will be reviewed and updated for effectiveness:

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

Review of the WVPP will include:

- Incident investigations and the violent incident log.
- Control measures in place and the effectiveness of those controls.
- By soliciting employee input and suggestions for improving the Plan for the subsequent plan year

General Provisions

SDSURF will take the following measures to obtain the active involvement of members of SDSURF and authorized employee representatives in developing and implementing the WVPP.

- Ensure members of SDSURF and authorized employee representatives have opportunities to participate in and communicate with those responsible for the WVPP regarding the following:
 - Identifying, evaluating, and determining corrective measures (engineering or work practice controls) to prevent workplace violence.
 - Designing and implementing any campus-specific training.
 - Reporting workplace violence incidents.
 - Reviewing post-incident investigations.
- Communicate all policies and procedures within the WVPP to SDSURF and authorized employee representatives using a variety of approaches, including in writing and verbally, in a form that is readily understandable.
 - Require all members of SDSURF to follow the WVPP and assist in maintaining a safe work and learning environment.
 - Ensure the WVPP addresses the hazards and corrective measures for all work areas/operations and learning environments.
- To promote work practices designed to make the workplace more secure, SDSURF will:

- Provide training to the members of SDSURF regarding the elements of the WVPP.
- Develop and implement measures to promote compliance with the WVPP.
- Retrain and counsel those who do not follow the WVPP.
- Recognize those who demonstrate safe work practices that promote the WVPP in the workplace.
- Counsel and/or discipline, as permitted by applicable laws, rules, regulations and collective bargaining agreements, those who fail to comply with the WVPP.

Accountability

Any faculty, staff, student, or volunteer who engages in an act or threat of violence or who retaliates against another member of SDSURF for reporting a workplace violence incident or concern is subject to disciplinary action under SDSURF policies and/or applicable collective bargaining agreements up to dismissal or expulsion. If a contractor, vendor, or visitor engages in an act or threat of violence or who retaliates against another member of SDSURF for reporting a workplace violence incident or concern, they may be barred from SDSURF-owned or leased property and have their business relationship with SDSURF suspended or terminated.

Non-Discrimination/Non-Retaliation

SDSURF does not discriminate or retaliate against victims of workplace violence or those who report workplace violence activities, whether they are reporting on behalf of themselves or someone else. Any employee's behavior identified as discriminatory or retaliatory will be immediately addressed through the organization's progressive discipline process.

Discipline and Adverse Action

All incidents will be evaluated fairly, and employees determined to be instigators or perpetrators of workplace violence will be subject to immediate corrective action, up to and including termination of employment for a first offense, and where applicable, legal prosecution to the extent allowable by law.

Employee Acknowledgment:

I have read and understand the policies of the Workplace Violence Protection Plan. I agree to adhere to

PRINT Name of Employee	Signature of Employee	Date

Addendum 1:

Inspections

TYPE 1 – Criminal Intent

Inspections for workplace security hazards from violence by strangers (Type 1) include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for security surveillance measures, such as mirrors or cameras.
- Procedures for employee response during a robbery or other criminal act.
- Procedures for reporting suspicious persons or activities.
- The posting of emergency telephone numbers for law enforcement, fire, and medical services.
- The environment to ensure employees have access to a company telephone with an outside line.
- The limitation of cash amounts on hand and using time access safes for large bills.
- Staffing levels during evening hours, weekends, holidays, and at other high-risk times.
- The use of work practices such as "the buddy= system," as appropriate, for identified risks.
- Adequacy of lighting and security for designated parking lots or work areas.
- Risks (where possible) of non-employer (client-based) work sites that may expose employees to harm.

TYPE 2 – Customer/Client

Inspections for workplace security hazards from violence by customers or clients (Type 2) include assessing:

- Access to, and freedom of movement within, the workplace.
- Adequacy of workplace security systems, such as door locks, security windows, alarms, physical barriers, and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are customers, clients, or service recipients of SDSURF's business.
- Employees' trained skillsets in preserving a safe environment and de-escalating the threat or hostile service recipient.
- Effectiveness of systems and procedures to warn others of a security danger, or to alert authorities via alarms, panic buttons or, another alerting device.
- The use of work practices such as "the buddy system", as appropriate, when identified risks are present or imminent.
- The adequacy of lighting and security for designated parking lots and employer work areas.
- The availability of employee escape routes.
- The safety and security of non-company (client) work sites in partnership with the client.

TYPE 3 – Worker-on-Worker

Inspections for workplace security hazards from violence executed by co-workers (Type 3) include assessing:

- How well SDSURF's Workplace Violence Prevention Plan has been communicated to employees, supervisors, and managers.
- How well SDSURF's management and employees communicate with each other.
- How well SDSURF's employees, supervisors, and managers know the warning signs of potential workplace violence.
- Access to, and freedom of movement within, the workplace by non-employees, specifically

recently discharged employees (should not be allowed to reduce risk).

- Frequency and severity of employee-reported threats of physical or verbal abuse by SDSURF's managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
- Employee disciplinary and discharge procedures.
- Other types of inspections not defined above and as needed and where appropriate.

TYPE 4 – Personal Relationship

Inspection for workplace security hazards from violence by relatives (past or present) of an employee include assessing:

- Access to, and freedom of movement within, the workplace by non-employees, specifically relatives with whom one of our employees is having a dispute.
- Frequency and severity of employee-reported threats of physical or verbal abuse which may lead to violent acts by a personal relation.
- Adequacy of workplace security systems, such as door locks, alarms, security windows, and physical barriers.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs.
- The use of work practices such as "the buddy system", as appropriate, for identified risks (e.g., walking employees to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or SDSURF work areas.
- Warnings and/or law enforcement involvement to remove relatives of employees from the work site and effectiveness of restraining orders.

Addendum 2:

Active Shooter

Any of the workplace violence incident types may involve instigators or perpetrators of workplace violence who possess firearms or weapons with the intent to cause massive harm to employees. If such an incident occurs, employees are expected to do whatever is necessary under the circumstances to:

1. Protect themselves from bodily harm.
2. Protect others from bodily harm.
3. Stop, distract, or neutralize the shooter, where possible.

If an employee suspects nefarious activity or imminent threat from another individual at the workplace, the employee is to immediately alert the WVPP Planning Group, their supervisor, and Human Resources. The WVPP Planning Group is responsible for alerting key stakeholders, and where appropriate, calling law enforcement. SDSURF will take all matters of this type very seriously. Employees who provide alerts, regardless of whether the threat is actual or assumed, will not face disciplinary action if such intent is proven to be for no other purpose than to protect lives and property from imminent danger or further harm.

See Something, Say Something

Employees provide the best option for observing conditions that may not look routine. If an employee sees something suspicious or unsettling, they need to speak up and say something to management right away. Immediately report suspicions to management, or if the supervisor is not present, report suspect observations to a person in authority. When at client site or other location, notify the highest person in authority and the WVPP PG as soon as is practical.

Run. Hide. Fight.

In the event an employee is caught in a situation while at SDSURF or when representing the organization at another location where an active shooter is or may be present, despite having limited resources or coverage, there are still actions an employee may take that can change the outcome and aid in survival.

According to the FBI, there are three key tactics to use when an active shooter is nearby. Only an employee in this situation can assess what the best option is to protect oneself and those in the immediate vicinity of the shooter. The following three options are offered to provide choices based on individual circumstances and situations.

Run: The best option is to get out of the situation as quickly and safely as possible, but in no means required or the only option to consider. Know the current location and try to remember where the nearest exits are in relation to one's current position. Leave all belongings behind. Run towards the nearest exit (or the one furthest away from the shooter). If exposed and visible to the shooter nearby, run in a zig zag pattern, as it is more difficult for the shooter to hit an unpredictable moving target.

Hide: Find a way to be invisible or not seen. Hide (even in plain sight) where the active shooter will not look. Employees should barricade themselves. Hide under or behind furniture to conceal or blend into the surroundings as much as possible. A filing cabinet provides better protection than a wall of sheet rock. Active shooters look for easy targets and do not typically spend time looking for those who are hiding unless they are the shooter's intended target.

Fight: This should be used as a last resort, as it is the most risky and dangerous. Take action but do so after thinking through the strategy. Act as quickly as needed to incapacitate the shooter, even if it only provides a few moments of delay. A few moments can lead to more lives being saved.

When law enforcement arrives, employees should always hold their hands and arms up in surrender posture so there is no confusion who the victims are. Quickly follow law enforcement's directives for exiting the building or location of the incident and relocating to a safe zone. Wait there for further instructions, as law enforcement may need to collect statements from each witness. Do not leave the safe zone for any reason unless law enforcement:

- is notified first (i.e., the employee needs to use the restroom).
- announces that employees are free to leave.

Addendum 3:

Workplace Violence Prevention Plan Employee Feedback Form

Date: _____ Location: _____

Name (optional): _____ Position (optional): _____

Department/Project (optional): _____

1. Describe any specific situations or areas in the workplace that you believe pose a risk for violence:

2. Have you noticed any environmental factors (e.g., poor lighting, blocked exits, lack of security) that could increase risk? Please detail:

3. What changes do you believe would help mitigate these risks?

4. Are there any policies or procedures that you believe need to be revised to enhance safety?

5. Additional comments or suggestions:

6. Would you like to be contacted for further discussion?

- Yes
- No

Contact Information (if yes): _____

Thank you for taking the time to share your observations. Your input is crucial for maintaining a safe work environment.