

DRAFT California State University Sacramento

Workplace Violence Prevention Plan

Per CA SB 553 (c) (1) (A)

“An employer shall establish, implement, and maintain an effective workplace violence prevention plan.”

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1. Definitions

- University: California State University Sacramento, its main campus, properties separate from the main campus that are under the control of the University, and all properties on and off campus under the control of a University Auxiliary.
- Campus Community: All persons, employees, students or members of the public who work, reside, utilize or visit the University at any time for any legitimate reason associated with the University.
- Workplace Violence Prevention Plan (WVPP): A University procedure that meets the requirements of CA SB 553 (c)(1)(A) and that is posted as an Appendix to the University Injury and Illness Prevention Plan (IIPP).
- Workplace Violence Hazard: An incident involving an interaction between persons associated with the Campus Community that involves violence or threatened violence, using a deadly weapon or object, threatening use or brandishing deadly weapon or object, that can be classified either as an Incident of Concern or a Criminal Behavior Incident.
- Workplace Violence Hazard Reporting System (WVHRS): A University Procedure to bring incidents into review and assessment by University officials and experts, including University Police.
- Behavioral Intervention Team (BIT): The University Behavioral Intervention Team is a multidisciplinary team, which meets regularly to monitor reports of students of concern and track patterns, behaviors, and disturbances to groups or individuals. The team can perform a threat assessment and determine the appropriate response and mechanism to intervene and respond to a crisis or concerning behaviors.
- Human Resources Workplace Violence Incident Assessment Team: University Human resources team that gathers reports of violence or potential violence, disturbing behaviors or threats that might occur involving one or more University employees and provide assessments and recommendations to reduce any potential or existing threats. University Auxiliaries Human Resources are to provide similar assessments, in coordination with University Police.
- Criminal behavior: Actions by an individual that can be identified by the University Police (UPD) as allegedly criminal, including but not limited to behaviors such as all forms of assault, physical harm, brandishing a weapon, using a weapon or object to harm another person, creating a public safety hazard, or interfering with the peaceful operation of the campus.
- Incident of Concern: An interaction involving a member of the campus community, including but not limited to an employee, a student, or a member of the public in which a person is assaulted in any manner, feels threatened either verbally, physically, or with an unseen weapon, threatened with potential violence, aggressively bullied or psychologically abused, or creating a belief that there can be future retaliation or violent act from a participant of the interaction.

- University Workplace Violence Hazard Reporting System (VHRS): a two-tier reporting system with one tier reporting Incidents of Concern and the other tier reporting Incidents of Criminal Behavior, that consists of a procedure that routes an Incident of Concern report immediately to the appropriate University Department, including, but not limited to, University Police, Human Resources, or Student Affairs, and an Incident of Criminal Behavior to the UPD.
- Workplace Violence Hazard Prevention Plan Review: University Risk Management reviews the Incidence Logs maintained by each Department participating in the VHRS, collates the information into an Annual Review that monitors its effectiveness, develops recommendations for adjustment as necessary, and then reports this Annual Review to the Executive Safety Committee ([ESC](#)), the University President, Cabinet, and leadership of each monitoring department.
- Title IX Violation: The University has existing programs processes and procedures for reporting, assessing, investigating, and adjudicating Title IX violations, and these are in their entirety unchanged by this WVPP. Incidents reported as Title IX violations may be cross referenced to the WVHRS and/or UPD by the Title IX Officer if appropriate.
- Clery reportable: According the Clery Act, an Incident of Concern or an Incident of Criminal behavior may be reportable under the Clery Act. The UPD has existing procedures for collecting and reporting incidents that are classified as Clery Act Reportable, and these procedures are independent from this WVPP, and will continue as they are currently implemented.
- Public Information Officer (PIO): The University spokesperson who provides public and media with any information about Incidents of Concern or Incidents of Criminal Behavior in direct coordination with UPD, and University executives as needed.

2. University Contact Information

- University Police: 916-278-6000.
- Sacramento Police: 911
- The University BIT online report form: [BIT Report form](#)
- Contact University Human Resources: [Report to Human Resources](#)
- Risk Management Safety Hotline: 916-278-2020
- Risk management Incident Report Form: [Injury on Campus Report Form](#)
- Title IX complaint form: [Online Complaint Form](#)

3. Identify Workplace Violence Hazards

- Each department conducts a workplace self-assessment to identify potential workplace violence hazards or incidents as reported by members of the campus community.
- Training will encourage employees to report any incidents or threats they experience or witness even if they don't rise to the level of criminal behavior.
- Students will receive information about when and how to report any violence incidents.

- Implement a University Workplace Violence Hazard Reporting System with a reporting form. The form is available here: (WVHRS)
- Incidents of concern involving only students are investigated by a University Behavioral Intervention Team (BIT) that includes, depending on the situation and level of aggression involved, student counseling, University Human Resources, UPD, University Risk Management for the purpose of performing a threat assessment and determining the appropriate response and mechanism to intervene and respond to a crisis or concerning behaviors.
- Incidents of Concern involving only employees are investigated by University Human Resources as the lead agency utilizing the Human Resources Workplace Violence Assessment and Response Team.
- UPD responds to any violent incident involving criminal or potentially criminal behavior and within CSU system guidelines for privacy and attorney client privilege, conduct the investigation as warranted by the behavior of the individuals involved, and works in coordination with BIT and Student Counseling, University Human Resources and University Risk Management and as appropriate, CSU Office of General Counsel (OGC) and CSU Risk Management.
- University Police, BIT, and Human Resources monitor trends in workplace violence incidents in which they are the responding Department.
- Not all Workplace Violence Hazards rise to the level of criminal behavior, and if the participants are employees only, Human Resources will be monitoring trends.
- For student-only interactions that do not rise to the level of criminal behavior, University counseling will be monitoring trends.
- Interactions that involve Incidents of Concern for any combination of employee, student or member of the public are monitored for trends by the Department appropriate for the persons involved.
- Interactions that involve criminal behavior for any combination of employee, student or member of the public are monitored for trends by the University Police.

4. Evaluate Workplace Violence Hazards

- Each assessment organization that receives any report of an Incident of Concern or a criminal behavior report will assess the severity and likelihood of violence for each identified incident of concern or report of criminal behavior. Assessments can be referred to the BIT, HR, or University Police as necessary.
- Consider the psychology, habits and proclivities of concerns and threats being assessed.
- Consider the location and time of potential incidents, the nature of the work, and the characteristics of the workforce and the wider community.
- Assess precursor incidents or activities that can lead to more aggressive or damaging behavior.
- Assess the social media and any personal connections for warning signs or flags.

- Regularly review and update the hazard evaluation in light of new information or changes in the workplace.
- The assessments will use California state law to define the 4 types of workplace violence as follows:
 1. “Type 1 violence,” which means 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 workers with the intent to commit a crime.
 2. “Type 2 violence,” which means workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 3. “Type 3 violence,” which means workplace violence against an employee by a present or former employee, supervisor, or manager.
 4. “Type 4 violence,” which means 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.

5. Correct Identified Hazards

- The Department that performs the Assessment will utilize a standard form for organizing an individual plan to address each identified hazard situation.
- Consider changes to the physical environment, adjustments to work practices, supervision, or provision of additional training to staff.
- Students can be referred to Student Counseling and Student Affairs for counseling and if necessary, further disciplinary action.
- Employees can be referred to counseling, or receive counseling information from Human Resources.
- Human Resources has the authority and methods to initiate any disciplinary actions warranted by the employee behavior, including dismissal.
- If the workplace violence hazard is assessed to be the result of criminal behavior, the UPD can initiate and coordinate a criminal justice response with the Sacramento authorities.
- If addressing the identified workplace hazard involves the need for a restraining order, the specifics of California Law [SB 553 \(2023\)](#) for restraining orders will be followed by UPD.

6. Communications

- In the event of catastrophic workplace violence incident, set up immediate PIO operations coordinated to all police and law enforcement services.
- In the event of catastrophic workplace violence incident, set up communications organization for all executives and campus President so that they are fully coordinated with law enforcement, and do not speak with media unless authorized and coordinated with Incident Command.

- In the event of catastrophic workplace violence incident, set up phone banks and hotlines for the families of the students to check on their situations utilizing Black Swan services.
- Communication Department operates with the PIO managing any appropriate social media.
- In the event of catastrophic workplace violence incident, UPD and any mutual aid agencies arrange to secure the area where the incident occurred to preserve evidence for the investigation and to prevent unauthorized persons from using the area for unauthorized media purposes.
- Employees who request information about a Incident of Concern or a Criminal Incident will be informed of the results of the investigation and any corrective actions to be taken within the guidelines from the OGC and UPD to preserve investigation integrity.

7. **Incidence Log**

- The University will maintain a Violence Incident Log that will be reviewed by Risk Management annually as part of the overall Plan review.
- The VIL will be shared with the CSU OGC at the intervals set by the CSU.
- Information that is recorded in the log for each incident shall be based on information solicited from the employees who experienced the workplace violence, on witness statements, and on investigation findings.
- The employer shall omit any element of personal identifying information sufficient to allow 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 any person's identity.
- The information recorded in the VIL shall include all of the following:
 1. The date, time, and location of the incident.
 2. The workplace violence type or types as described in Section 3.
 3. A detailed description of the incident.
 4. 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.
 5. 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.
 6. A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 7. The type of incident, including, but not limited to, whether it involved any of the following:

1. Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
2. Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
3. Threat of physical force or threat of the use of a weapon or other object.
4. Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
8. Consequences of the incident, including, but not limited to:
 1. Whether UPD, HR, or BIT was contacted and their response.
 2. Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
9. Information about the person completing the VIL, including their name, job title, and the date completed.
10. The information in the VIL is subject to review by the CSU OGC for Attorney Client Privilege.
11. The information in the VIL will be limited for the purpose of avoiding and preventing any unintended identification of any individuals.

8. Investigation

- UPD will investigate of each incident that has criminal behavior and coordinate with local PD as needed.
- For incidents involving only employees, including faculty that don't rise to the level of criminal behavior, Human Resources investigates incidents.
- Student Affairs through the BIT investigates incidents involving only student conduct.
- Multiple University Departments may be involved and coordinated if the incident involves any combination of students, employees, or members of the public, including but not limited to Risk Management, and the CSU Office of General Counsel.
- Depending on the lead agency, and the scope of the incident, the investigation may take an extended period of time, and communication between the University departments is coordinated.
- In addition to law enforcement and judicial aspects of a crime incident, the University President may determine that a non-law enforcement review of what happened, why it happened, and what can be done to prevent a similar incident in the future, is warranted.
- Investigation findings are released to the public only when possible without jeopardizing any ongoing investigation or jeopardizing any OGC attorney privileges.

- Investigation findings may be released in tranches over time depending on the nature of the incident.
- If a non-law enforcement report of what happened and what could be done to prevent another incident in the future or mitigate another future incident is performed, the resulting report will be provided to all campus stakeholders, and the public.
- Records created by this plan, including the Violence Incident Log will be retained for 5 years.

9. Training:

- All University employees will receive training that provides them with the knowledge and understanding of the Workplace Violence Prevention Plan, where it can be found for ongoing reference, their rights and responsibilities within the Plan and how to respond in the event they are involved in a workplace violence incident.
- Employees will receive the training on an annual basis through the University Learning Management system.
- University Students will receive awareness information that provides them with knowledge of the Workplace Violence Prevention Plan at the start of each academic semester.
- The training for employees will consist of the following elements:
 1. The employer's plan, 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.
 2. The definitions and requirements.
 3. How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
 4. Workplace violence hazards specific to the employees' jobs, the corrective measures the employer has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
 5. The violent incident log and how to obtain copies.
 6. An opportunity for interactive questions and answers with a person knowledgeable about the employer's plan.

10. Plan Review

- The plan shall be reviewed by Risk Management at least annually, when a deficiency is observed or becomes apparent, and after a workplace violence incident.
- A report of this review will be made public at a regularly scheduled meeting of the Executive Safety Committee. ([ESC](#)) and provided to the University President and Cabinet.

11. Incident Response

- Provide immediate assistance to any victims of workplace violence.
- In the event of criminal behavior, University Police provides security in coordination with mutual aid assistance from Sacramento area law enforcement services as needed.
- In the event of criminal behavior leading to injuries, any victims of workplace violence are triaged and provided first aid, and medical services as needed.
- Secure the area where the criminal incident occurred to preserve evidence for an investigation.
- Provide psychological support, or referral to counseling services for any students or employees who require this support, with students utilizing Student Counseling and employees utilizing the Employee Assistance Program.
- Medical issues for employees may be addressed through Worker's Compensation (WC) or through Deadly Weapon insurance if the WC and insurance criteria are met.
- OSHA log issues are managed by the University WC carrier and are coordinated through WC.
- Medical issues for students and members of the public may be addressed through Deadly Weapon insurance if the insurance criteria are met.
- In the event of a significant violence incident, Counseling may be available for employees and students for at least a year post-incident utilizing Deadly Weapon insurance if the insurance criteria are met.
- CSU Office of General Counsel and Risk Management staff manage claims and any litigation that may arise from the incident and utilize Deadly Weapon insurance as needed if the insurance criteria are met.
- In the event of a significant violence incident, CSU Office of General Counsel and Risk Management will consult with the University President and Cabinet to manage any post-incident building use issues and may utilize Deadly Weapon insurance if the insurance criteria are met.
- In the event of a significant violence incident, the University may consider any manner and form of a potential memorial object or activity, and can utilize Deadly Weapon insurance as needed if the insurance criteria are met.
- The University, through its Deadly Weapon insurance program can aid and counseling for any trauma issues for victims of violence when a workplace violence defendant goes on trial if the insurance criteria are met.

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